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ORIGINAL

July 30, 2008

VIA First Class Mail

Joan Martin Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Banks:

This responds to the Request for Information Pursuant to Section 104 of CERCLA for the Peck Iron and Metal Site in Portsmouth, Virginia issued May 30, 2008 by Laura B. Janson, Chief, Cost Recovery Branch, United States Environmental Protection Agency, Region III, addressed to the Williamsburg Brewery of Anheuser-Busch Companies, Inc. It was received at Anheuser-Busch Companies, Inc. (together with its subsidiaries the "Company") on June 2, 2008. The Company requested and received a 30 day extension of time in which to respond to this request on June 18.

We understand that the Site has been defined as the Peck Iron and Metal Site located in Portsmouth, Virginia with the listed address of 3850 Elm Avenue. It is also our understanding that the Site has been used for decades for scrap metal recycling, and that operations ceased at the facility in or around 1997.

The Company has made reasonable inquiry and conducted a diligent search of currently available Company records, as well as interviews of all Company personnel that had responsibility for waste management at the time of the transactions with Peck, as well as personnel who currently manage waste, or are responsible for recordkeeping relating to waste management at the Brewery. The responses provided pursuant to the Information Request are not intended and should not be construed as an admission of liability by the Company for the release or threatened release of hazardous substances at the Site, or for any removal or response costs or damages attributable to hazardous substances at that Site.

ORIGINAL

Answers to Numbered Questions in Information Request

The Company's answers and objections to each of the questions below are set out below following the question from the Information Request.

1. List all shipments of scrap materials, including scrap metal, which your company has sent to the site. Include the date for each transaction, the type and quantity of scrap metal sent, the amount paid or collected in connection with each transaction, the method of payment, and identity of the person making or receiving the payment.

Pursuant to the Company's document retention policy, records relating to the management of recyclable material are only maintained for 3 years. Company records indicate that during that retention period, there were no sales of scrap material to Peck, nor payments received for such material.

In addition, a review of the Company's records relating to universal and hazardous waste generated and shipped off-site by the Company do not reveal any shipments of such waste to the Site. Interviews of Company personnel indicate that Peck Iron and Metal maintained a roll-off container for scrap metal recycling at the Brewery for some period beginning in or around the early 1980's, although they had no information regarding whether material collected in these containers was taken to the Site, or another facility owned by Peck Iron and Metal Co., Peck Recycling, Julius S. Peck, B. David Peck, or Aaron Peck, or any other related company or Peck family member (collectively "Peck"). Records received from EPA indicate that materials were sold to Peck during the period of 1990 through 1995, with additional information that sales may have occurred as early as 1985.

ORIGINAL

Records received from EPA indicate that the following materials were sold to Peck by the Brewery.

Date	Material	Amount (pounds)
2/19/1990	Scrap Aluminum (also noted as steel)	21,620
9/21/1990	Scrap metal	21,020
10/24/1990	Scrap metal	27,240
11/27/1990	Scrap metal	20,640
12/11/1990	Scrap metal	17,580
12/19/1990	Scrap metal	14,260
12/28/1990	Scrap metal	9,000
1/23/1991	Scrap metal	21,980
1/25/1991	Scrap metal	13,400
1/31/1991	Scrap metal	14,040
2/12/1991	Scrap metal	19,100
3/12/1991	Scrap metal	26,500
4/10/1991	Scrap metal	18,120
4/19/1991	Scrap metal	11,020
5/9/1991	Scrap metal	21,980
6/5/1991	Scrap metal	17,980
6/24/1991	Scrap metal	12,340
7/11/1991	Scrap metal	19,980
7/23/1991	Scrap metal	17,480
7/30/1991	Scrap metal	14,200
8/6/1991	Scrap metal	11,740
8/21/1991	Scrap metal	13,340
6/6/1995	Shredder Steel	9,200
6/28/1995	Shredder Steel	15,140
7/19/1995	Shredder Steel	13,080
7/26/1995	Shredder Steel	10,800
8/15/1995	Shredder Steel	17,060
8/25/1995	Shredder Steel	20,760
8/29/1995	Shredder Steel	22,600
	Total	493,200
		220.2 Gross Tons

2. For each shipment of scrap materials identified in response to Question 1 above, identify:
a. the source of the scrap material;
b. the prior use of the scrap materials;
c. whether the scrap material was a collection of homogenous materials;
d. whether the scrap materials was tested for any hazardous substances prior to shipment to Peck Iron and Metal Co.

a. The sources of scrap materials were from the Anheuser-Busch Brewery in Williamsburg located on Pocohontas Trail (the "Brewery").

b. The prior uses included structural steel and piping, as well as some components of brewing and packaging equipment.

c. The materials were relatively homogenous in that the scrap metals consisted of primarily only carbon and stainless steel. The Brewery currently maintains separate roll-offs for stainless steel and other scrap metals, although interviews with Brewery personnel indicate that both types of metals were previously commingled in a single roll-off. This practice appears to be reflected in the invoices provided by EPA.

d. The Brewery has had a long standing practice of identifying and abating asbestos containing materials, such as insulation, lead paint, and calcium silicate insulation prior to any work that would have resulted in the removal of structural steel, piping or other components. This practice has included the identification of such wastes through sampling. Materials identified through this process which would be disturbed by such work were removed and stored in separate areas of the Brewery to ensure that asbestos and lead paint wastes were not commingled with other wastes at the Brewery. However, lead paint abatement typically consisted of removal of lead paint from the areas within a foot of hot work, such as welding, cutting and grinding. Larger sections of piping or steel may have been removed with areas of lead paint intact and placed in the roll-off container for recycling. In addition, oil and other fluids are drained from any equipment prior to it being sold for recycling. These practices have been in place since at least the early 1980's.

3. At the time of the transaction(s) involving scrap materials listed in your response to Question 1(a), what was the intended disposition of the scrap materials at the Site?

The intended disposition of the scrap materials was for use in creating new metal products through recycling.

4. Did a market exist for the scrap metal listed in your response to Question 1, above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g. ISRI, Department of Defense, or wherever your company would find the grade published)

There was a market of the materials as evidenced by payments received by the Company from Peck for such materials; however the Company did not and does not track that market or the trends of that market.

5. What commercial specification grade did the scrap metal listed in your response to Question 1 (a) meet? Identify/ list the commercial specification grades that each scrap metal identified in 1 (a) met.

Piping and structural carbon steel is general grade A36. Additionally, stainless steel equipment and components are typically grades 304, 316 or A9.

6. After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to Question 1 (a) was to be made available for use as a feedstock for the manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated

It was the understanding of the Company that all scrap metal sold for recycling was for use as feedstock for new saleable products.

7. Could the Scrap metal listed in your response to Question 1 (a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

It was and is the Company's understanding that some portion of the scrap metal sold for recycling could have been used as a replacement or substitute for virgin raw materials. However, the Company does not track the details of the scrap metal market with regards to the precise uses for these materials.

8. Could any products to be made from the scrap metal listed in your response to Question 1 (a) have been used as a replacement or substitute for a product made, in whole or in part from a virgin raw material? If so, provide details.

The Company believes that some portion of the products ultimately made from the scrap metals were used as a replacement or substitute for products made, in whole or in part, from virgin materials. However, as stated above, the Company does not track the market for recycled scrap metals, nor the products made from this material.

9. Did your company process any of the scrap materials sent to Peck Iron and Metal Co. prior to transport and delivery to the Site? If yes, describe the process used and the purpose for subjecting the scrap materials to the process.

The Brewery did not process the metals prior to sale to Peck, other than those abatement processes discussed in the response to Question 2, above.

ORIGINAL

10. Was the transaction between your company and Peck Iron and Metal Co. : 1) an outright sale? 2) the subject of a written or verbal "tolling" agreement between the companies; or a 3) the "banking" of the transacted materials in a metal account at the request of your company for return or other disposition at a later date.

Based on the recollections of the former purchasing manager, the Brewery and Peck entered into annual contracts for the outright sale of scrap metals, and did not enter into tolling or banking arrangements with Peck. This arrangement is further evidenced by the limited invoices and settlement statements. To the Company's knowledge, no transacted materials sold to Peck were ever returned to the Company.

11. Did your company have a basis for believing that the scrap materials listed in your response to Question 1(a) would be recycled? If not, what was that basis? Provide supporting documentation.

Interviews with Company personnel indicate that the Company's understanding was that the scrap metal taken by Peck was to be recycled. As Peck paid the Brewery for the materials, this was evidence that the materials had some residual value, and would not simply be sent for disposal.

12. Describe all efforts (i.e. site visits) taken by your company to determine what would be done with the scrap materials identified in your response to Question 1(a) that may have been sold, transferred or delivered to Peck Iron and Metal Co. at the Site.

Interviews with Company personnel and a review of all available records did not disclose the efforts taken by the Company with regards to Question 12.

13. What steps (e.g. internal procedures, Federal, state and local compliance inquiries) were taken by your company to ensure that Peck Iron and Metal Co. the recipient of the scrap materials listed in your response to Question 1 (a), was in compliance with applicable Federal environmental regulations or standards and any amendments, with respect to the scrap materials it received from your company?

The Company does not have any records indicating what efforts may have been conducted relating to ensuring that Peck was in compliance with applicable environmental regulations or standards. However, as stated above, the Company has a long standing policy of conducting a review of dealers used for scrap metal recycling. The current policy requires that a wide range of inquiries into a recycling facility's compliance with law, the nature of the recycling process, end use of the recycled material, and what regulations apply to both the facility and haulers of recyclable material to the facility. Although it is unclear what policy was in place at the time Peck began its dealings with the Brewery, historically the Company has at a minimum made inquiries into whether scrap metal dealers and other recycling vendors have been the subject of federal or state environmental enforcement.

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14. Did your company have any basis for believing that the Peck Iron and Metal Co. facility at the Site was in compliance with substantive provisions of any Federal, state or local environmental laws or regulations, or compliance order or decree applicable to the handling, processing, reclaiming, storage or other management activities associated with the scrap materials listed in your response to Question 1(a)? If so, identify that basis and provide supporting documentation.

The Company does not have any records relating to the Site's compliance status. As discussed above, however, Company policy would have called for some inquiry into the compliance history of any scrap metal dealer utilized by the Brewery.

15. Describe the efforts your company undertook with respect to the management and handling of the scrap materials listed in your response to Question 1 (a), including the extent to which you complied with customary industrial practices current at the time of the transaction designed to minimize contamination of the scrap materials by hazardous substances.

The Company utilized and continues to utilize periodic visual examination procedures to ensure that materials being sold for recycling do not contain hazardous substances. As noted above, Company procedures ensure that all work which resulted in the production of scrap metal is preceded by an examination of the area for asbestos and lead paint, followed by an abatement action as necessary. Asbestos and lead paint wastes are and were managed in separate areas of the Brewery from those utilized for scrap recycling. However, Company personnel did indicate that in some instances lead paint abatement efforts may be limited to an area roughly one foot around any area where hot work was conducted, such as cutting, welding or grinding.

In addition, waste oil, waste paint and waste ink generated at the Brewery are and were managed in completely separate areas of the Brewery, and policies are and have been in place to ensure that such wastes are not commingled with scrap metals. In addition, the roll-off containers for scrap metal are and were separated from the area used for handling other recycled materials at the Brewery, which include cardboard, plastics, plastic bottles, mixed paper, spent grain, wood pallets, beechwood chips, aluminum and glass cullet.

While a letter dated August 1, 1985 to Dan Kelley at the Brewery indicates that a load was rejected by Peck due to the presence of suspected asbestos and lead storage batteries, the Company did not locate any documentation confirming that the materials in such load did, in fact, contain asbestos insulation. In addition, the Brewery has separated and managed universal wastes such as lead acid batteries for a number of years. No information is available regarding how batteries may have become commingled with scrap metal sold to Peck.

ORIGINAL

16. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management or other activities associated with the scrap materials listed in your response to Question 1(a).

The Company does not possess documentation of storage, transport, management or other activities associated with the scrap materials sold to Peck other than those provided by EPA. This is due to the fact that records relating to the handling of recyclable materials are retained for 3 years under the Company's document retention policy, while accounting records relating to accounts payable or receivable are retained for 6 years. However, interviews of Company personnel indicate that asbestos and lead paint in the Brewery was abated and handled in accordance with applicable environmental and safety regulations and standards prior to any scrap metals being sold to Peck.

17. Identify the person(s) answering these questions and requests for copies of documentation on behalf of your company.

The Company specifically objects to EPA communicating directly with its current employees. Should EPA have interest in further inquiry of current employees, its counsel should communicate with the Company's undersigned counsel.

Without waiving its objections, the Company provides the following list of individuals currently employed with the Company who are known to have or have had some role, or may have had some role, in the management of scrap metals.

Marisa Botta, Environmental Health and Safety Manager for the Brewery beginning in 1999 through the present, was primarily responsible for answering these questions with the assistance of inside and outside counsel. In addition, the Company endeavored to interview all current employees who worked at the plant for the period of 1980 to the present who may have information relating to the requests. The following Company personnel, with their positions at the Brewery noted, were interviewed with regards to these questions and requests:

John DeSelm – Director, Environmental Assurance (St. Louis)
Gordon L. Martin – Environmental Health and Safety Manager
JoAnn Lyell – Office Assistant, Environmental Health and Safety Department
Vernard F. Farris – Storeroom Manager
Kirk Reno – Resident Construction Engineer
Dwayne Mattmuller – Resident Construction Engineer from 1995 to 1999
George F. Riesbeck – Plant Engineer
David O. Hamlin – Engineer
James Suer – Chips Finishing Reliability Manager (formerly Maintenance Supervisor in both Brewing and Packaging)
Hattie C. Evans – Accounting Analyst
Susie Jones – Human Resources Assistant (formerly Accounting Clerk)
Doug Schlecte – Accounts Payable (St. Louis)
Pat Guittar – Accounts Receivable (St. Louis)

ORIGINAL

18. For each Request, identify all persons consulted in the preparation of the answer

See list above

19. For each Request, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Request and provide true and accurate copies of all such documents.

The Company has reviewed hard copy and electronic records maintained both at the Brewery as well as the Company's corporate offices in St. Louis. Searches have been conducted seeking any documentation or associations with Peck. While the Company's accounting system identifies Peck Iron and Metal Co. as a vendor, there are no records of any transactions in the system except for a notation indicating that the last sale occurred in November of 1997. No hard copy files exist with regards to transactions with any of the Peck entities. The information provided in this response is based on recollections by personnel employed at this Brewery at the time of the transactions with Peck, as well as the documents provided by EPA.

20. Describe in detail any agreement/ contract your company has had with Peck Iron and Metal Company. In addition, identify any other company operating at the Site and describe in detail any arrangements your company has had with each such company, if any, including the time period of your company's involvement with such company.

Based on the recollections of the former purchasing manager, the Brewery and Peck entered into annual contracts for the outright sale of scrap metals. The former purchasing manager indicated that these were relatively short one or two page contracts, and primarily only required that Peck maintain a roll-off container at the Brewery, and pay set prices for recyclable material placed therein. The Company is not aware of any other company operating at the Site.

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21. Provide all business records pertaining to your company and Peck Iron and Metal Co. or any other company operating at the Site, including:

- a. Copies of correspondence to and from these companies, including letters and memoranda (both internal and external);**
- b. Copies of invoices, manifests, bills-of-lading, purchasing orders, tickets, and any other documents pertaining to shipping, receiving and transportation scrap materials; and**
- c. Copies of business records pertaining to sale, transfer, delivery or disposal of any hazardous substances, scrap materials, and /or recyclable materials to the Site.**
- d. If you are unable to provide any or all of these documents, explain why and what you did to find them.**

a-c. No documents were located responsive to Questions 21 a through c despite a diligent search of Company records.

d. To help in locating records, the Brewery was searched including the records maintained by the Environmental Health and Safety Department, as well as the Storeroom and Engineering Department. In addition, a search was conducted for any hard copy records that may have been sent from the Brewery to the Company corporate offices. In addition, the Brewery conducted a search of the records sent to Iron Mountain, which is utilized as an off-site records archive.

Anheuser-Busch corporate accounting personnel conducted a thorough search of the corporate accounting system. As noted above, the only information revealed by such search is that Peck Iron and Metal Co. was a vendor utilized by the Company, and the last sale occurred in November of 1997.

22. If you have reason to believe that someone could provide a more detailed or complete response to any of these questions or requests for copies of documents, or if you have reason to believe that there could be someone who may be able to provide additional documents that would be responsive to these questions and requests for copies of documents, identify such person(s), identify the additional documents that they may have and describe any information related to these questions that they may have.

All current employees for whom there was a reasonable belief of knowledge related to waste disposal and recycling activities at the Brewery during the relevant time frame were interviewed. Based on these interviews, and corporate records regarding prior employees, the following individuals may have additional information regarding these questions:

Gerry Provenchar – Former Storeroom employee. Mr. Provenchar may currently reside in
Kathryn Aston – Former Environmental Health and Safety Manager. Ms. Aston may currently reside in
Dan Kelley – Former Purchasing Agent. The Company does not have any information regarding the whereabouts of Mr. Kelley.

23. Provide details, including dates and materials involved, of all on-site spills or releases of hazardous materials of which you have knowledge and that occurred during the processing of scrap materials containing hazardous substances at the Site.

The Company, including all current personnel interviewed with regards to this response, is unaware of any spill or releases of hazardous substances at the Site that may have occurred during the processing of scrap materials, or at other times.

ORIGINAL

24. To the extent not identified in Question 1, identify all transactions or agreements for disposal in which your company gave, sold, or transferred any material or item, scrap materials, waste materials, pollutant, or contaminant, including copper-bearing material, and ash to the Site. In addition:

- a. State the dates on which each such person may have given, sold transferred or delivered such material.**
- b. Describe the materials or items that may have been given, sold, transferred or delivered including the type of material, chemical content, physical state, quantity by volume and weight and other characteristics.**
- c. Describe the nature, including the chemical content, characteristics, physical state (e.g. solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement**
- d. State whether any of the hazardous substances identified in subpart c. above exhibit any of the characteristics of a hazardous waste identified in 40 C.F.R. Section 261, Subpart C.**

To the best of the Company's knowledge, no materials sold to Peck contained hazardous substances with the possible exception of intact lead paint that may have remained on piping, and other scrap metals as listed in Question 1, following abatement efforts. The Company does not have any information on the amount of such materials that may have been included in scrap metal sold to Peck. Such lead paint would have been a solid, intact paint coating on the surface of the scrap metals in question.

25. What other materials, if any, did your company send to the Site? (items/materials not covered in Question 24 above)?

- a. Describe the purpose of each sale, transfer, or delivery of materials to the Site.**

To the best of the Company's knowledge, only scrap metals listed in Question 1 were sold to Peck. All were solid in form.

26. Describe what was done to materials indicated in your response to Questions 24 & 25 above once they were brought to the Site including any further processing of materials.

The Company does not have any information regarding the processes utilized at the Site which may have been employed in the recycling of scrap metals.

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27. Identify the person(s) who sold, transferred, delivered, and selected the Site as the location at which scrap materials from your company were to be disposed or treated.

a. Identify all documents mentioning these arrangements for disposal

b. Describe all efforts (i.e., site visits) taken by the person(s) identified in your response to Questions 25 above to determine what would be done with the materials that may have been sold, transferred, or delivered after such materials had been sold, transferred or delivered to the Site.

It is unclear who originally selected Peck for recycling of scrap metal. It is possible that it was Earl Jones who was formerly the Storeroom Manager prior to 1993, but is now deceased. Typically, the Storeroom Manager monitored the roll-off container daily, and called the vendor when it was full. The Storeroom Manager would then complete the Material Disposal Order Form, and provide this form to accounting. Based on the form, accounting would invoice the vendor and process payments.

The Company has no records indicating what efforts may have been taken to determine the ultimate fate of scrap metals sold to the Site.

28. For each sale, transfer, or delivery of materials to the Site, had any hazardous substances been added to the materials described in your response to Questions 24 & 25 above? If so, identify the hazardous substances added and the person responsible for adding such hazardous substance.

a. Why were these hazardous substances added to the materials?

b. Describe the source of or the process that produced the materials described in your response to Questions 24 & 25.

The Brewery has not and does not make it a practice to mix hazardous materials with scrap metals. In fact, Brewery procedures have been in place to ensure that any hazardous substances are removed from scrap metals prior to recycling, such as the abatement of lead paint, asbestos and calcium silicate insulation, and the draining of any oil from scrap metal and used equipment prior to sending such material for recycling. In addition, the various waste streams, particularly hazardous waste streams, have been and are maintained in separate areas and Brewery procedures ensure that these wastes remain segregated.

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29. Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g. responsibility for the disposal, treatment, storage recycling or sale of your company's wastes, scrap materials and/or recyclable materials). Hereafter, these individuals are referred to as environmental caretakers. For each environmental caretaker, indicate the dates of the individual's employment or contractual obligation (i.e. the dates indicating the length of the individual's tenure[s]), the nature of the individual's duties and responsibilities and a description of the type of environmental information that the individual would know).

The Environmental Health and Safety Manager is responsible for overall waste management, including scrap recycling at the Brewery.

Kathryn Aston - 1990 to 1999
Marisa Botta - 1999 to present

The Storeroom Manager was previously responsible for the logistics of scrap metal recycling at the Brewery.

Earl Jones - up to 1993
Vernard Farris - 1993 to present

Anheuser-Busch Companies, Inc.
By Counsel

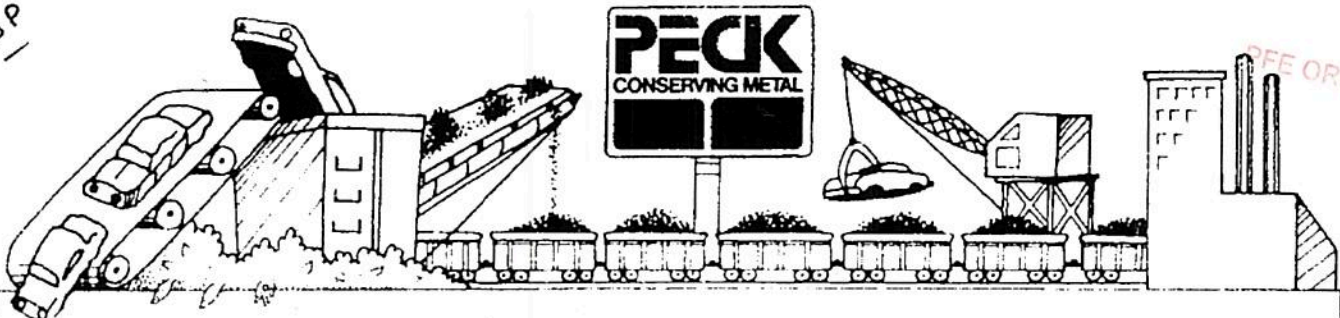


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BOP



OFF ORIGINAL

August 1, 1985

Mr. Dan Kelley
Purchasing Agent
Anheuser Busch
P.O. Box U
Williamsburg, VA 23185

Dear Mr. Kelley:

As Mr. Baer discussed with you earlier this week, the load that we received contained materials that we cannot accept: suspected asbestos & lead storage batteries.

It is our policy not to allow on our grounds any Hazardous/Toxic substances. The ever growing list is now so long that reasonable space and time do not allow enumeration.

The Government standards are so strict that the suspected asbestos insulation must be removed as the pictures show, under the most stringent conditions.

Please assist us in the future. We know you would not knowingly send Hazardous/Toxic Material from your plant to ours. The dangers to health, finances and the environment are too astronomical.

Thank you in advance for your understanding and cooperation.

Very Sincerely,
PECK IRON & METAL CO., INC.

Fred R. Berman
Fred R. Berman, Manager

cc: B. David Peck, Vice President
Richard D. Collins, General Manager
Bill Baer, Manager
Hazardous/Toxic Waste File

Enclosures: (3) Poloroid Snapshots

FRB/glf

INTERVIEW SUMMARY
Task Order 0001 Site 24
Peck Iron and Metal Site

William Brewster

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103


Prepared by:

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Alexandria, VA 22315

Work Assignment Number:
Date Submitted:
Contract Number:
EPA Work Assignment Manager:
Telephone Number:
Chenega Project Manager:
Telephone Number:
Interviewer:

Task Order 0001 Site 24
April 28, 2009
EP-S3-04-01
Joan Martin-Banks
(215) 814-3156

(b) (4)



Name: William Brewster ("WITNESS")

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

Type of Interview: In-Person

Date of Interview: April 27, 2009

On April 27, 2009 the WITNESS was interviewed at his place of employment XXXX Senior Investigator XXXX, of XXX. The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded. This interview was a follow-up interview conducted on March 17, 2009. Only new areas of questioning was covered during this interview. The Interviewee had also recalled additional information since the March 17, 2009 interview.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS reiterated that he was employed by Peck Iron and Metal ("PIM") from 1975 to 1998. The WITNESS stated that he was employed as the controller at the Portsmouth PIM Site.

The WITNESS was asked to review an additional list of companies and asked to identify any of these companies who sold scrap to PIM at the Portsmouth Site.

- U.S. Government: the WITNESS stated that in addition to the St. Julian's Creek Annex, PIM purchased scrap on a bid basis from Camp Allen, Cheatham Annex, Yorktown, Quantico, Ft. Meade, and the Philadelphia Navy Base. The WITNESS stated that he is unable to recall the specific types of scrap PIM purchased from each location.
- Anheuser Busch: the WITNESS recalled additional information relating to Anheuser Busch. The WITNESS stated that Busch transported scrap to both the Peck facility in Richmond and the Portsmouth location. The WITNESS stated that he recalls purchasing stainless steel beer kegs.
- Norfolk Shipbuilding and Dry Dock: the WITNESS recalls Norshipco as a steady customer. The WITNESS stated that PIM would contract with Norshipco on a yearly basis. PIM supplied Norshipco with 30 and 40 cubic yard containers and when the

containers were half full; PIM would pick up the full container and leave an empty container. The WITNESS stated that much of the scrap metal contained lead base paint. The WITNESS was unable to provide any additional information relating to the type of scrap purchased by PIM. The WITNESS stated that containers supplied by PIM at the Norshipco were weighed at the Norshipco Site and the PIM Site. The WITNESS stated that Norshipco would keep a copy of their weigh ticket.

- Sumitomo Machinery: The WITNESS recalled additional information relating to this Company. The WITNESS stated that Sumitomo would occasionally retool at their manufacturing plant. The WITNESS stated that PIM would purchase scrap from this retooling which would include electric motors. The WITNESS does not know if any scrap contained PCBs.
- Southeastern Public Service Authority ("SPSA"): the WITNESS stated that SPSA sold scrap metal that was brought to the Landfill. The WITNESS stated that individual employees of SPSA picked scrap metal from the landfill and sold this scrap to PIM. The WITNESS stated that SPSA also picked up washers, dryers and refrigerators from home owners and sold these items to PIM.

When asked if he had any knowledge of liquid waste, PCBs, grease, oil, Freon or asbestos that was sold to PIM, the WITNESS stated that he had no knowledge. The WITNESS stated that when containers were brought in by the PIM truck drivers, the contents were weighed at the scale house. The scale operator was supposed to inspect the contents of the container to verify the types of metal being sold to PIM. The WITNESS stated that the scale operator had a movable step ladder that was used to look inside the containers and trucks. The WITNESS stated that there was no way to see or inspect items that were not located on the top of the container.

The WITNESS further explained that if there was something that was obviously not permitted to be disposed of at PIM, the crane operator would be the only employee who could identify these items and notify the office. The WITNESS used as an example a full 55-gallon steel drum.

When asked to further explain the disposition of records generated at PIM, the WITNESS provided the following.

The WITNESS stated that PIM operated autonomously from the Richmond facility and that all records and paperwork was maintained at the Portsmouth facility.

The WITNESS explained that when David Peck became the sole owner of PIM in approximately 1993, the WITNESS stated that he was directed to call the Richmond facility with raw sale numbers at the end of each month. The WITNESS stated that PIM continued to maintain the records generated at PIM which included the weigh tickets and monthly recapitulation of the largest customers.

The WITNESS stated that he recalls the name of one crane operator and provided the following.

- XXXXXXXX.

The WITNESS stated that XXXXX was the yard supervisor and may have knowledge of additional yard employees at PIM.

The WITNESS had previously been shown an additional list of companies and the WITNESS had commented on the companies he had knowledge.

When asked the names of other employees at PIM, the WITNESS provided the following.

- XXXXXXXX
- XXXXXXXX

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

Interviewer's Comments and Suggested Follow-up Interviews

Interviewer Comments: The WITNESS was cooperative and forthcoming.

The WITNESS suggested that I interview crane operators and yard employees for more specific information relating to the types of scrap that was received at PIM.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.

Suggested follow-up Interviews:

Name: William Brewster ("WITNESS")

(b) (6)

Affiliation: Former Employee/Peck Iron and Metal Company

Telephone:

(b) (6)

Type of Interview: In-Person

Date of Interview: March 17, 2009

On March 17, 2009 the WITNESS was interviewed at his place of employment by (b) (4) (b) (4) Senior Investigator, of (b) (4) The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by PIM from 1975 to January 1998. The WITNESS stated that Julius Peck had owned the PIM facility in Portsmouth since 1945. The WITNESS stated that in 1975 Julius Peck sold the PIM scrap yard to the following British scrap Company.

- Bird International.

The WITNESS stated that Bird International (Bird) operated the PIM scrap yard until 1979. The WITNESS stated that in 1979 Bird sold the PIM scrap yard back to Julius Peck.

When asked if he worked for Bird during the time period Bird operated the PIM scrap yard, the WITNESS stated no. The WITNESS further explained that from 1975 to 1979 the WITNESS worked for the Peck Equipment Company. The WITNESS stated that the Peck Equipment Company was located adjacent to the PIM scrap yard at the address of 3850 Elm Street. The WITNESS stated that the Peck Equipment Company occupied three large warehouses previously owned by Proctor and Gamble Company.

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When asked if the Peck Equipment Company rented the warehouses from Proctor and Gamble the WITNESS stated that Julius Peck may have rented the warehouses initially; however, the WITNESS stated that Julius Peck eventually purchased this property.

The WITNESS explained that Peck Equipment purchased surplus ship equipment such as turbines, engines and ship parts. The WITNESS stated that the U. S. Navy published monthly catalogs listing equipment needed. The WITNESS stated that Peck Equipment would sell the surplus equipment to the Navy.

The WITNESS explained that when Peck sold the PIM scrap yard to Bird, Peck was precluded by the contract with Bird from getting into the scrap business within a fifty mile radius of PIM. The WITNESS stated that Julius Peck started the Richmond scrap yard as a result.

The WITNESS explained that he was the controller/bookkeeper for PIM during the entire time he was employed by PIM. The WITNESS stated that he paid accounts billable and prepared bills for payment. The WITNESS stated that he was assisted by: (b) (6)

The WITNESS was asked the names of the Companies who sold PIM scrap metal and disposed of the scrap at PIM the WITNESS provided the following.

- U.S. Government: The WITNESS stated that PIM's biggest customer was the Government, and more specifically the Navy. The WITNESS stated that PIM purchased scrap through auctions held at the St. Julian's Annex. The WITNESS stated that Scrap from military basis throughout the east coast was shipped to the St. Julian's Annex. The WITNESS stated that PIM also bid on bulk scrap through the Department of Defense Material Command. The WITNESS stated that the scrap consisted of iron, non-ferrous metals and steel.
- Oceana Naval Air Station: The WITNESS stated that PIM made "spot" purchases from Oceana. The scrap included pipes and steel.
- Newport News Shipbuilding and Dry Dock Company ("NNSC"): The WITNESS stated that NNSC was a large account and that PIM purchased heavy steel, plates from ships steel beams.
- AT&T Company: The WITNESS stated PIM purchased wire and cooper from AT&T.
- Verizon: The WITNESS stated that PIM purchased wire and cooper from Verizon.
- Norfolk-Portsmouth Beltline: The WITNESS stated that PIM purchased rail, spikes, bolts and switches from this Company.
- Proctor and Gamble: The WITNESS explained that prior to 1975 the P&G factory located adjacent to PIM was a soap factory. The WITNESS stated that in

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approximately 1975 the P&G plant was converted to a peanut producing factory. The WITNESS stated that P&G sold steel bins and old motors to PIM.

- Colonas Ship Yard: The WITNESS stated that PIM purchased aluminum, iron and light steel from Colonas.
- Virginia Power and Electric Company ("VEPCO"): The WITNESS stated that VEPCO was a steady customer at PIM, however he could not recall the types of waste.
- Anheuser Busch: The WITNESS stated that Anheuser Busch was a customer of PIM and the Peck facility in Richmond. The WITNESS could not recall the types of waste purchased from this Company.
- CSX Transportation, Inc.: The WITNESS stated that PIM purchased scrap from CSX on a regular basis however he was unable to recall the type of scrap.
- Gwaltney: The WITNESS stated that PIM purchased scrap from Gwaltney on a regular basis. The WITNESS described the waste as duck work, conveyer systems and condensers. When asked if the condensers contained Freon, the WITNESS stated that he does not know.
- Norfolk Shipbuilding & Dry Dock: The WITNESS stated that this Company was a regular customer at PIM. The WITNESS was unable to recall the types of scrap.
- Plasser American: The WITNESS stated that Plasser was a semi-regular customer at PIM. The WITNESS described the scrap as steel frames and beams.
- Sumitomo Machinery Corporation of America ("SMCA"): The WITNESS stated that SMCA was a regular customer at PIM. The WITNESS could not recall the types of Scrap.
- Woodington Electric: The WITNESS stated that Woodington was a regular customer and that PIM purchased wire from Woodington.

The WITNESS stated that PIM purchased scrap from many other companies however he was unable to recall any further names.

When asked if he was aware of the location of any records, the WITNESS stated yes and provided the following.

- The WITNESS stated that when he left employment with PIM in 1998, all of the records relating to PIM were located in the building at 3500 Elm Street. The WITNESS stated that these records included all books and ledgers covering the prior twenty years.

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When asked the name of the insurance company that carried PIM insurance, the WITNESS stated that PIM contracted with (b) (6) to handle all insurance matters.

The WITNESS was asked to explain the association of the following companies to the Peck family. The WITNESS provided the following.

- Peck Iron and Metal Company: The WITNESS stated that Peck Iron and Metal was used as a holding company as well as the name of the PIM location in Portsmouth.
- Peck-Portsmouth Recycling: The WITNESS stated that he was unfamiliar with this name.
- ELM Leasing Company: The WITNESS stated that ELM leasing company was the Peck Company that leased the warehouse next to 3500 Elm Street. The WITNESS stated that Peck leased this warehouse to numerous businesses for storage of equipment.
- JSP Land Company, Inc.: The WITNESS stated that JSP was organized so that Julius Peck could rent a portion of the property under JSP Land Company to PIM and receive the rent for his property.

When asked the names of other PIM employees, the WITNESS provided the following.

(b) (6) Scale operator
(b) (6) Yard supervisor.
(b) (6) Assistant bookkeeper.

The WITNESS stated that PIM employed more than fifty laborers and truck drivers. The WITNESS indicated that these employees were usually from the local area.

The WITNESS stated that the area known as Carddock was a local neighborhood and (b) (6)
(b) (6)

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA. The WITNESS stated that he cannot recall the types of scrap that was purchased by PIM. The WITNESS provided the following information.

ABB National Industries, Hampton, VA: Could not recall.

Alcoa (Reynolds): Could not recall

American Gem Corporation, Chesapeake, VA: Could not recall.

Anheuser-Busch, Inc., Williamsburg, VA: See comments above.

Argent Marine, Solomons, MD: Could not recall.

Associated Naval Architects, Inc., Portsmouth, VA: Could not recall.

CSX Transportation Co., Charlotte, NC: See comments above.

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Electric Motor and Contracting Co., Chesapeake, VA: Could not recall
Ford Motor Company, Norfolk, VA: Could not recall.
General Electric Company, Richmond, VA: Could not recall.
General Foam Plastics Corp., Norfolk, VA: Could not recall
General Motors Corporation: Could not recall.
Gwaltney Company, Portsmouth, VA: See comments above.
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: See comments above.
Overhead Door Company, Virginia Beach, VA: Could not recall.
Phillip Morris, Inc., Richmond, VA: Could not recall.
Plasser America, Chesapeake, VA: See comments above.
Potomac Electric Power Co., Washington, D.C.: Could not recall.
Power Mechanical, Inc., Hampton, VA: Could not recall.
Southeastern Public Service Authority ("SPSA"), Chesapeake, VA: Could not recall
Sumitomo Machinery Corp., Chesapeake, VA ("SMC"): See comments above.
U. S. Navy, Norfolk, VA: See comments above.
AMF Bowling: Richmond, VA: Could not recall.
Alcatel-Lucent, Murry Hill, NJ: Could not recall.
Brenco, Petersburg, VA: Could not recall.
Carolina Steel Corporation, Greensboro, NC: Could not recall.
Chesapeake, Corporation, Richmond, VA: Could not recall.
Dean Foods, Dallas Texas: Could not recall.
E.I. DuPont de Nemours and Company, Wilmington, DE: Could not recall.
Federal-Mogul Corporation, Southfield, MI: Could not recall.
GATX Corporation, Chicago, IL: Could not recall.
The Hon Company, Muscatines, IA: See comments above.
IGM USA Inc., Charlotte, NC: Could not recall.
Kraft Foods, Northfield, IL: Could not recall.
Norfolk Southern Corporation, Norfolk, VA: Could not recall.
Pizzagalli Construction Company, Garner, NC: Could not recall.
Schlumberger Industries, Houston, TX: Could not recall.
Seaboard Marine, Miami, FL: Could not recall.
Stanley Hardware, New Britain, CT: Could not recall.
Super Radiator Coils, Richmond, VA: Could not recall.
Waste Management (Chambers Waste Systems of Virginia): Could not recall.
Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.
AT&T Micro-Electronics: Could not recall
Ball Metal Container, Williamsburg VA: Could not recall
Capitol City Iron Works: Could not recall
Cleveland Wrecking: Could not recall
Continental Can, Hopewell, VA: Could not recall
Davis Boat Works: Could not recall
General Electric, Portsmouth, VA: Could not recall
Gray Metal: Could not recall
Hoechst Celanese, Portsmouth, VA: Could not recall.

ENFORCEMENT CONFIDENTIAL


Keller Industries: Could not recall
L.A. Gentry: Could not recall
Moon Engineering: Could not recall
Nassau Metals: Could not recall
NAITO America: Could not recall
Proctor and Gamble Company: See comments above
St. Laurent Paperboard Co. (Smurfit-Stone Container): Could not recall
Tyson Foods: Could not recall
Virginia Electric and Power Company (VEPCO): See comments above.
Weidmuller (Mann Industries): Could not recall
Woodington Electric, Virginia Beach/Norfolk, VA: See comments above.

The WITNESS stated that he cannot recall the types of scrap associated with each of the above PIM customers.

When asked where the records were kept, the WITNESS stated that the reconciliation sheets were kept in a separate file from the weigh tickets. The WITNESS stated that while he was employed at PIM, his files were filed in a filing cabinet in his office.

When asked the names of other employees at PIM, the WITNESS provided the following.

(b) (6)



"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

Signed _____
(Name)

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DECLARATION OF BARRY DAVID PECK

I, Barry David Peck, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 2nd day of June, 2009.

1. I currently reside at
2. I was born on years of age.
3. Peck Iron and Metal, Inc. ("Peck Iron") began in Portsmouth, VA in 1945 and in Richmond in 1946. I joined the company in 1959 and moved to Richmond from Portsmouth in 1969. During the previous ten years, I worked in most areas of operations with the exception of general and administrative offices. The work included inspection, material handling, transportation and processing. When I moved to Richmond in 1969, I worked under the various multiple managers who had controlled operations since 1946. As they moved out and retired over the years, I took on more responsibilities for management of the company. In order to deal with contracts and other legal matters, I was made a Vice President of the company, and eventually President. Julius Peck formerly was the sole owner and the President and he was active in management and operations until his retirement in 1994, at which time I became President of the company. Julius Peck recapitalized the company in 1981, when his ownership was converted to preferred stock and the common stock was transferred (one-third each) to his three sons, including me. In 1998, I purchased my brothers' common stock and became the sole stock holder of the company.

4. I am currently the President of The Peck Company, a corporation organized under the laws of Virginia, with a principal place of business of 1500 Huguenot Road, Suite 108, Midlothian, Virginia.

5. I received an Information Request from the Environmental Protection Agency

(EPA) dated January 13, 2006. On behalf of The Peck Company, I executed and submitted to EPA a response to that Information Request written by my legal counsel Dan J. Jordanger (referred to as "the May 10, 2006 letter"). A true and correct copy of the May 10, 2006 letter is attached hereto as Exhibit 1.

6. My father, Julius Peck, founded Peck Iron in 1945, subsequently acting as Chairman of the Board of Peck Iron.

7. Peck Iron previously operated multiple scrap yard operations, including one at 3220 Deepwater Terminal Road, Richmond, Virginia ("Deepwater Facility") and another at 3850 Elm Avenue, Portsmouth, Virginia ("Portsmouth Facility").

8. Julius Peck acquired the Portsmouth Facility from a Mr. Duncan.

9. The Portsmouth Facility originally constituted 15 acres of land. Later land acquisitions from Proctor & Gamble increased the size of the Facility to 33 acres of land.

10. Approximately 8 acres of the Portsmouth Facility were used for scrap processing.

11. The United States Navy ("USN") held an easement on the Portsmouth Facility totaling approximately one acre.

12. The Portsmouth Facility is "U-shaped," as represented by my hand-drawn Facility diagram, a true and correct copy of which is attached as Exhibit 2 to my Declaration. This diagram is my best effort at a fair and accurate representation of the Portsmouth Facility.

13. Julius Peck worked at the Portsmouth Facility from 1945 until it closed in the early 1990s.

14. I worked at the Portsmouth Facility from 1961 to 1969, where I performed many different functions, including driving a truck, sorting scrap, inspecting scrap metal at military customer's facilities, and preparing bids for scrap from military customer's facilities.

15. From 1969 through 1997, I worked at the Deepwater Facility, first as the Manager, then as Vice President, and finally as President.

16. On May 11, 2004, Stephen G. Werner, the Director of Environmental Services for Draper Aden Associates, submitted to Mr. Donald S. Welsh, Regional Administrator of Region III, U.S. EPA, a Self-Implementing PCB Cleanup Plan for the Portsmouth Facility on behalf of The Peck Company. That letter is attached to this Declaration as Exhibit 3. In the May 11, 2004 letter, Mr. Werner provides a history of the property as "summarized by the owner, the Peck Company." The italicized site history contained in that letter was about the operations at the Deepwater Facility in Richmond, Virginia, and not about the operations at the Portsmouth Facility.

17. To the best of my knowledge, the United States Department of Defense never owned or operated the Peck Iron and Metal business on Elm Avenue in Portsmouth.

18. Peck Iron sold the Deepwater Facility to Sims Metal in 1997.

19. At the time of the sale of the Deepwater Facility to Sims Metal, Peck Iron transferred custody of records related to Peck Iron's records, including certain Portsmouth Facility records.

20. William "Bill" Brewster was Office Manager of the Portsmouth Facility of Peck Iron's operations there and during part of the time I worked at the Portsmouth Facility.

21. Certain Portsmouth Facility records were shipped to the Deepwater Facility. Roger Spero, an outside accountant, may have advised William Brewster which documents to send to the Deepwater Facility.

22. In the later years of Portsmouth's operations, the Deepwater Facility handled billing for the Portsmouth Facility. Therefore, invoices from these later years may be in the

records provided to Sims Metal.

23. In the past, upon entering the Portsmouth Facility, you came upon an office building next to a scale. This building was eventually knocked down and replaced with trailers that held records of the operation. To the best of my knowledge, these records have been destroyed and/or lost.

24. I have done a diligent search and, with exception to the records controlled by Sims Metal, I am not aware of any other Portsmouth Facility records.

25. To the best of my knowledge, personnel records for the Portsmouth Facility do not exist.

26. My brother, Aaron Peck, worked as Julius Peck's personal assistant at the Portsmouth Facility.

27. Richard Collins was a crane operator and yard supervisor at the Portsmouth Facility and at another Peck Iron Facility called Pinner's Point, working mostly at Pinner's Point.

28. Pinner's Point was a scrap metal operation owned and operated in the past by Peck Iron on the Elizabeth River in Portsmouth, Virginia.

29. Peck Iron sent marine equipment, including pumps and engines, from USNships, from Pinner's Point to the Portsmouth Facility. The Byrd Corporation purchased and operated the Pinner's Point operation during the 1970's. I believe Byrd was sold to Sims Metal in the 1990's.

30. Peck Iron employed two secretaries and one bookkeeper at the Portsmouth Facility.

31. Rene Gant is a bookkeeper who worked for Peck Iron in 1999 when Peck Iron was audited by the Internal Revenue Service.

32. Approximately 50 yards behind the records trailers identified in Paragraph 23, a 2000 square foot cinder block building was used for the separation of non-ferrous material.

33. An area known as the "shear area" is where scrap containing lead and PCBs was processed.

34. Battery breaking occurred on the Site, but ceased at some point thereafter in approximately the mid-1970s.

35. Materials from battery breaking were collected in drums and battery casings were thrown into piles.

36. One of my duties during the time I worked at the Portsmouth Facility was to "break batteries." Batteries at the Portsmouth Facility were axed or "hatcheted" open and the acid was drained. Also, at times, batteries were crudely opened by melting the edge of the battery box with a torch, and dumping the "guts" of the battery into a drum. A lot of spillage would occur during the process of emptying the batteries. The battery acid ate holes in the workers' pants. The battery casings, which had lead residue, were bulldozed over on the Peck Facility property. Recovered lead would have been placed in drums and sold to a smelter.

37. Sometime in the mid-1970s, battery breaking ceased at both the Portsmouth Site and the Richmond Site. After that point, whole heavy metal or plastic encased batteries were placed outdoors on pallets and shipped to re-processors.

38. Peck Iron unloaded, inspected, prepared scrap from the suppliers then shipped it in trucks, railroad cars and oceangoing ships to various consumers.

39. The scrapping operations at Peck Iron's Portsmouth Facility were handled differently from those operations at the Deepwater Facility.

40. The Portsmouth Facility accepted scrap from various businesses through

contractual agreements. Arrangements were at times initially agreed to over the telephone, but normally were followed up with a written contract or other paperwork.

41. From its inception in 1945, most of Peck's purchases of scrap were from various U.S. Government Agencies, particularly military bases. Purchases usually were from "Defense Surplus Sales" bids, other "RFP"s, and "spot" bids.

42. The USN sent the Portsmouth Facility low-level radioactive material, scrap with PCBs, and other material later found to be hazardous.

43. The USN and other military bases sent rail carloads and truck loads of obsolete, damaged, worn out, surplus, etc. materials to the Portsmouth Facility, including components of airplanes, ships, railroads, vehicles, insulated cables, transformers, weapon systems (including shells), tank parts, etc. All the items contained unidentified attachments, solutions, and materials.

44. Scrap came to Portsmouth from many United States military bases and federal agencies. I recall specifically that the Portsmouth Facility received scrap from Norfolk Naval Shipyard, St. Julian's Creek, Camp Allen, Cheatham Annex, Yorktown, Quantico, Fort Meade, Army, Coast Guard, Naval Air Station, the National Oceanic and Atmospheric Administration, the Maritime Administration, etc. Also, there were regular purchases from Military Bases in North Carolina, Pennsylvania, Maryland and other States.

45. The largest Federal Gov't suppliers of scrap were those that conducted conversion, decommissioning, or demilitarizing of war ships and smaller boats; aircraft repairs; and handled ordnance material.

46. Moon Engineering was a ship repair yard that was not one of the larger suppliers of scrap to the Portsmouth Facility,

47. Virginia Power and Electric Company ("VEPCO") was a large source of scrap for

the Portsmouth Facility.

48. In the late 1940's when Peck Iron received automobiles at the Portsmouth Facility, the normal practice was to rip the tops off and to cut the chasses up into #2 steel. The tops were baled and the motor blocks were broken in order to get the aluminum pistons. This practice ended when Peck acquired more sophisticated equipment.

49. Peck Iron used oil, that may have contained PCBs, to control the dust on the roads at the Portsmouth Facility and burned the oil in drums for heat in the winter.

50. Customers of the Portsmouth Facility dated back to the 1940s and 1950s and may have sent hazardous substances to the Portsmouth Facility in their scrap. Such substances were not known to be hazardous and would be comingled with the other scrap or equipment when delivered to Peck.

51. Scrap recovered from motors at the Portsmouth Facility included armatures with coils.

52. Anheuser Busch, in Williamsburg, sold scrap to Peck. It was delivered to the Deepwater Facility and the Portsmouth Facility.

53. Ford Motor Company, located in Norfolk, Virginia, was a customer of the Portsmouth Facility. Its scrap may have included capacitors with PCBs, asbestos liners, batteries, and truck components containing PCBs, cadmium, zinc, and other heavy metals.

54. Reynolds Metals, now Alcoa, was a major customer of Peck Iron and provided aluminum scrap and other metals that may have contained hazardous material. I believe that some of the Reynolds Metal scrap may have gone to the Portsmouth Facility.

55. Anheuser Busch was a customer of Peck Iron and sent materials to both the Portsmouth Facility and the Richmond Facility. Correspondence from Peck Iron to Dan Kelley

of Anheuser Busch stated that asbestos and lead storage batteries were being sent with their scrap to the Deepwater Facility.

56. Allied Chemical may have sent hazardous substances to Peck Iron.

57. DuPont was a large customer of the Richmond Facility and the Portsmouth Facility. DuPont once sent scrap that contained a drum marked "Radioactive" to Peck Iron.

58. Associated Naval Architects was a ship repair yard that sent scrap to the Portsmouth Facility.

59. CSX was a customer of Peck Iron's Portsmouth Facility from the 1940s to the 1960s. CSX sent large amounts of scrap metal that may have contained hazardous substances to the Portsmouth Site, including transformers containing PCBs. Someone from the predecessor of CSX was present at the Portsmouth Facility "all the time." CSX sent railroad brake shoes, motors, switch gears, axels, wheels and many other components of rail cars that may have contained hazardous substances. Predecessors of CSX were Seaboard Coastline, Atlantic Coastline, C&O and B&O railroads.

60. Electric Motor and Contracting was an old customer that rewired motors and may have sent scrap with PCBs and asbestos to the Portsmouth Facility.

61. C&P Telephone was an old customer of the Portsmouth Facility that may have sent telephone components to the Portsmouth Facility. Other scrap may have contained hazardous materials (e.g. solvents, coatings, attachments, etc.).

62. General Electric was an old customer of the Portsmouth Facility. General Electric repaired motors and sent damaged components that may have had hazardous substances to the Portsmouth Facility.

63. General Foam was an old customer of Peck Iron.

64. American Brakeshoe was a customer of Peck Iron's Portsmouth Facility that sent components that may have had hazardous substances to the Site.

65. The Portsmouth Facility received large quantities of scrap metal from Delco, a division of General Motors.

66. Gwaltney was a customer of Portsmouth that sent significant quantities of machinery, lubricants, engines, and transformers to the Portsmouth Facility.

67. Newport News Shipbuilding and Drydock ("Newport News Shipbuilding") was an old customer of the Portsmouth Facility (dating back to at least the 1950s and 1960s) that built, repaired and converted Navy ships. In the process of converting Navy ships, Newport News Shipbuilding generated significant amounts of lead, solvents, attachments, coatings, lubricants, cables, gaskets and other materials that may have had hazardous substances that would have gone the Portsmouth Facility.

68. Most companies in the past, including Newport News Shipbuilding, did not empty oil with PCBs from their scrap because the regulations did not require it and perhaps because they received more money from Peck Iron because the scrap would be heavier and they were paid by weight.

69. Norfolk Shipbuilding and Dry Dock ("Norshipco") was an old customer of the Portsmouth Facility (dating back to at least the 1950s and 1960s) that repaired and converted Navy ships. In the process of converting Navy ships, Norshipco generated significant amounts of scrap that may have had PCBs, and other hazardous substances that would have gone to the Portsmouth Facility.

70. Norshipco's scrap sent to the Portsmouth Facility was generated before regulations concerning PCBs went into effect. Most companies in the past, including Norshipco,

did not remove oil with PCBs from their scrap because the regulations did not require it at that point and because perhaps they received more money from Peck Iron because the scrap would be heavier and they were paid by weight.

71. Norshipco also sent to the Portsmouth Facility metals with attachments that may have included asbestos, gaskets with PCBs, coaxial cable which may have contained hazardous substances, "take outs".

72. Overhead Door was a customer of the Portsmouth Facility that sent fabricated sheets and hinges to the Portsmouth Facility.

73. Philip Morris sent scrap to the Deepwater Facility in Richmond, Virginia.

74. Potomac Electric Power was an old customer of Peck Iron's (dating back to the 1950s). Potomac Electric Power disassembled one of its plants, generating scrap that may have had hazardous substances, but I am not certain to which Facility this material was sent.

75. Plasser American was a customer of the Portsmouth Facility and sent scrap there.

76. Southeastern Public Service Authority ("SPSA") had a facility located next to the Portsmouth Facility. Metal scrap was removed from the garbage and trash processed by SPSA and sent to the Portsmouth Facility and hazardous substances may have been included.

77. Sumitomo Machinery was a customer of the Portsmouth Facility that may have sent hazardous substances to the Portsmouth Facility, including gear boxes and electric motors containing PCBs.

78. VEPCO was a very large scrap supplier to the Portsmouth Facility that sent transformers with PCBs and probably other hazardous substances to the Portsmouth Facility.

79. Nassau Metals was a customer of the Portsmouth Facility.

80. GATX was a customer of the Portsmouth Facility that sent large amounts of scrap

metal that may have contained hazardous substances to the Portsmouth Site, including transformers containing PCBs. GATX sent railroad brake shoes, motors, switch gears, axels, wheels and many other components of rail cars that may have contained hazardous substances.

81. The Hon Company was a customer of the Deepwater Facility.

82. Norfolk Southern, formerly Norfolk and Western, was a customer of the Portsmouth Facility that sent scrap metal that may have contained hazardous substances to the Portsmouth Site, including transformers containing PCBs. Norfolk Southern sent railroad brake shoes, motors, switch gears, axels, wheels and many other components of rail cars that may have contained hazardous substances. Norfolk Southern's repair shop was the source of the scrap sent to the Portsmouth Facility.

83. Schlumberger Industries was a Portsmouth customer, although I am not sure of the type of scrap it sent. Schlumberger Industries, with headquarters in Texas, was in the maritime and tugboat business and had a repair shop in the Portsmouth, Virginia area.

84. Seaboard Marine was an old customer of the Portsmouth Facility that sent scrap that may have contained electric motors, piping with lead, parts ripped out of boats, condensers, generators and pumps with hazardous substances.

85. Stanley Hardware was a customer of the Deepwater Facility.

86. Waste Management may have generated scrap (e.g. air conditioners) that it may have sent to the Portsmouth Facility.

87. Brenco was a customer of the Deepwater Facility.

88. Woodington Electric was a customer of the Portsmouth Facility.

89. Capital City Iron Works was a fabrication business. I am unsure whether it was a Deepwater Facility or Portsmouth Facility account.

90. Cardwell Machine was a customer of the Deepwater Facility.
91. E.R. Carpenter was a customer of the Deepwater Facility.
92. NAITO America, a Japanese company, was a supplier of scrap to the Portsmouth Facility.
93. Tyson Foods was a customer of the Portsmouth Facility. I believe that the scrap it sent to the Portsmouth Facility included electric motors that may have had PCBs, cutting machine oils, and lubricants.
94. Keyser at Montvale was an auto hauler located in Roanoke that was a customer of the Deepwater Facility.
95. Cleveland Wrecking was a demolition company from Cincinnati, Ohio that sent scrap from the USN and other non-military customers to the Portsmouth Facility.
96. Thousands of suppliers that had a relationship with the Portsmouth Facility over a long period of time provided a continual stream of business. One such business was Newport News Shipbuilding and Drydock.
97. The Chesapeake Corporation ("Chesapeake") had a facility in West Point, Virginia. Chesapeake sold scrap to the Portsmouth Facility in the 1960s through the 1980s. During that time period, Chesapeake sent materials such as batteries, solder, galvanized wire, roofing material, and other metals that contained lead, tin, and zinc, lubricants and other substances. During that time period, Chesapeake also sent scrap including transformers to the Portsmouth Facility that may have contained PCBs and other chemicals. Chesapeake sent lead-acid batteries to the Portsmouth Facility during the time period when battery breaking was going on there.
98. Chesapeake's West Point Mill generated scrap that was loaded on trucks from

containers, where scrap materials were collected to be sent to the Portsmouth Facility.

Transformers of different shapes and sizes were thrown in the bins that Chesapeake sent to Peck Portsmouth. I believe that transformers were sent by Chesapeake to Peck Portsmouth when there were electrical upgrades at the West Point mill, and that such transformers could have been older, unserviceable transformers or newer serviceable transformers.

99. Scrap metal sent by Chesapeake to the Portsmouth Facility would have contained lead paint, and would have included metal cleaning solution, lubricants, liquids and grease. Transformers would have contained PCBs, and galvanized corrugated steel from the mill's roof might have included insulation that contained asbestos.

100. Chesapeake sent scrap metal to both the Portsmouth Facility and the Richmond Facility.

101. Any transformers received by Peck Portsmouth, regardless of whether they were serviceable, were processed by Peck Portsmouth in order to recover the scrap metal and were not purchased to be sold to third parties for reuse. Scrapping operations at Peck Portsmouth were labor intensive, and due to its processing practices, it was not cost effective for Peck Portsmouth to pull out any usable parts for reuse or resale. After copper and transformer oil were removed, copper metal was recovered from transformers and the steel was cut to sizes required by the steel mill consumers.

102. Transformers sent to Peck Portsmouth were steel boxes that contained oil with the PCB additive and steel wrapped with copper in different configurations and quantities. Insulation may have been on the copper and glass balls may have been attached. Some of the persons who sent transformers to the Portsmouth Site would have removed the insulation prior to sending them.

103. Transformers sent to the Portsmouth Facility could have been large (more than 100 pounds), but most were small in size (less than 100pounds).

104. The Peck Company regularly received "suspect material" meaning material that may have contained hazardous substances, from various companies, including but not limited to Vepco, Chesapeake, DuPont, the Virginia Highway Department, military bases and shipyards with which the Peck Company did business.

105. Various non-gov't companies and scrap collectors brought to the Portsmouth Facility metal from gov't bases, landfills, farms, manufacturing plants, machine shops, etc The largest dealer was John Holland, whose operation was located in Suffolk, Virginia.

106. Victor Peck, , is my cousin.

107. Victor Peck may have operated Strategic Alloys, which may have done business with the Department of Defense ("DOD"). If it did, any scrap received from DOD would have been sent to the Portsmouth Facility.

108. Peck purchased much scrap from Dupont and Allied Chemical. Other "old" customers whose material might have gone to Portsmouth included: Union Bag Camp (large paper company in Franklin, VA) and Georgia Pacific. Peck in Richmond received (and rejected) railroad tank cars from Allied that contained noxious fumes. Dupont sent Peck's Richmond plant, containers marked, "radioactive." Scrap was usually loaded at the customers' sites in trucks or railroad cars and delivered to Elm Ave in Portsmouth or to Richmond for processing. Most of the sellers had multiple locations from which they would have sold their scrap and it would have been delivered to/received at Elm Ave (e.g. scrap from damage at an accident site; abandoned equipment; obsolete facilities; left over materials from a repair and maintenance shop, etc.). The scrap likely had attachments or components with solvents or lubricants or fuels,

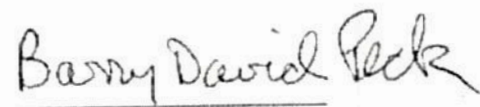
etc., that may have included heavy metals, chemical additives, coatings, etc., that may have been hazardous. When processing the scrap, the contaminated elements would have fallen to the ground. Had Peck been informed or warned of any dangerous properties, it would not have purchased or handled the material.

109. In general, where references are made to "hazardous substances," I did not know at the time whether the substances sent to Peck were in fact actually hazardous or actually had dangerous properties.

110. Had we been informed or warned of the dangerous nature of these substances, The Peck Company would not have purchased or handled those materials or would have handled those materials differently.

NOTE: This Declaration is based on my best recollection, information and belief. This Declaration is based on information gained in my capacity as a principal and officer of The Peck Company and its predecessors and, in certain respects, not necessarily as the result of direct knowledge or involvement. My statements are based on current knowledge and information which may have been unknown to me at the time the events occurred.

I, Barry David Peck, declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd day of June, 2009.


BARRY DAVID PECK



Ex 11



SDMS DocID 2071071

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May 10, 2006

**VIA ELECTRONIC AND
OVERNIGHT MAIL**

Mr. Randy Sturgeon (3HS23)
United States Environmental
Protection Agency, Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

**Re: Response of The Peck Company to Request for Information Pursuant
Under Section 104(e) of CERCLA With Regard to Peck Iron and Metal
Property, 3850 Elm Avenue, Portsmouth, Virginia**

Dear Mr. Sturgeon:

On behalf of The Peck Company (hereinafter "Peck"), this is the response, as of the date set forth above, to the letter from Dennis P. Carney dated January 13, 2006, and received by Peck on March 6, 2006, requesting information with regard to the Peck Iron and Metal property in Portsmouth, Virginia (hereinafter the "Information Request").¹ We are submitting this response in our capacity as counsel for Peck. Peck understands that it has a continuing obligation to supplement this response if additional information becomes available, and Peck reserves the right to submit additional information that it may find to be responsive to the Information Request.

Set forth below are each question contained in the Information Request in *bold-faced, italicized type*, followed by Peck's response as of the date of this letter.

¹ The Information Request called for a response within 30 calendar days of the date on which we received it. In a letter to Dennis Carney sent on March 17, 2006, David Peck requested an extension until May 5, 2006, to submit Peck's response. On behalf of EPA, Mr. Carney granted this request in a letter sent to Mr. Peck on March 28, 2006. Patricia Miller granted Peck an additional extension until May 10, 2006, which I confirmed in an e-mail to Ms. Miller on May 3, 2006.

Mr. Randy Sturgeon
May 10, 2006
Page 2

1. ***As it relates to the Site, what is the current nature of your business or activity or any other business or activity that may be taking place at the Site?***

RESPONSE:

Currently a minority owned business, Able Body Demolition, is using the property to store its trucks. Able Body also has unloaded inert material, including concrete, dirt, and asphalt, on the property, and has spread some of the piles of asphalt and concrete. The company has followed Peck's instructions not to remove any soil from the site, and to keep any visitors or vandals off the site.

2. ***As it relates to the Site, what was the nature of any business or activity during the period of time you or any member of the Peck family, or a company substantially owned or controlled by the Peck family, either owned and/or operated the Site?***

RESPONSE:

From 1945 to approximately 1990, the business conducted at the property was the purchase, processing, storage and shipping of metal scrap from various military bases, other federal, state and local government agencies, and local businesses. Liquidation of remaining scrap materials off of the property continued into the early 1990s. In addition, Peck Equipment Company was established in the 1960's to locate hard-to-find parts for the U.S. Navy.

In a letter from S.G. Werner to D.S. Welch of EPA dated May 11, 2004, Mr. Werner provided an historical summary of Peck's activities at the property. This letter also was provided as an attachment to an e-mail from S.G. Werner to K. Bunker dated July 28, 2004.

3. ***Describe how the size or property boundaries of the Site have changed since the inception of Peck activities at the Site.***

RESPONSE:

Some time during the period between 1945 and 1950, Peck acquired land adjacent to the original parcel. In the 1990's, less than an acre was acquired from the U.S. Navy. In 2003, Peck donated a conservation easement of approximately six acres along Paradise Creek to the Elizabeth River Project ("ERP"), which modified the land to serve as a wetland and forested buffer area. In the course of its work, the ERP removed a berm, dredged soils, re-contoured the area, and deposited soil back on other portions of the Peck property.

Mr. Randy Sturgeon

May 10, 2006

Page 3

The current 33 acres are on five parcels. The following table summarizes the title history of the current property.

Deed Records Search

DATE	GRANTOR	GRANTEE	COMMENTS
05-18-88	Peck Iron & Metal Co., Inc.	Elm Leasing Co.	2.990 ac - 1 st part 2 nd & 3 rd parts - Easements
10-01-76	USA Dept. of Navy	Peck Iron & Metal Co., Inc., et al.	3 rd part - Easement, 0.05 ac.
06-30-76	Norfolk- Portsmouth Belt Line Railroad Co.	Peck Iron & Metal Co., Inc., et al.	2 nd part - Easement agreement for use of Scott Center Road Crossing
10-28-69	USA Dept. of Navy	Norfolk-Portsmouth Belt Line Railroad Co.	Deed of Easement
12-30-63	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	4.544 ac.
05-13-88	Peck Iron & Metal Co., Inc.	Peck Portsmouth Land Co.	Parcel B - 22.924 ac.
12-30-63	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	4.544 ac.
01-26-60	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	21.4 ac.
01-26-60	Peck Iron & Metal Co., Inc.	Kenneth McCracken, Trustee	Holder of Note, 21.4 ac.
03-31-31	Portsmouth Cotton Oil Refining Corp.	Proctor & Gamble	Parcels A & B - 110 ac.
01-01-88	Julius S. & Bess P. Peck	JSP Land Company	2 ac; Parcel A-1.174 ac.; Parcel B- 2.733 ac.; 1st-0.8016 ac.; 2 nd -1 ac.; 3 rd - 0.55 ac.; 4 th -Parcel 1-0.004 ac., Parcel 2-0.17 ac.
07-29-47	Trites Refinery, Inc.	Julius S. Peck	2 ac.
07-12-47	Philip C. Cuddeback, et ux.	Trites Rendering, Inc.	

HUNTON & WILLIAMS

Mr. Randy Sturgeon

May 10, 2006

Page 4

03-08-47	Frederick W. Marrat	Philip C. Cuddeback	
01-07-29	American Forest Products Company	Frederick W. Marrat	
10-11-28	Cradock Mfg. Co.	American Forest Products Company	
09-29-50	Richard B. Kellam, Special Commissioner, et al.	Julius S. Peck & R.F. & Thirza Trant	Parcels A (1.174 ac.) & B (2.733 ac.). Kellam Commissioner for dispute in Trant family. R.F. paid off dispute amount to Commissioner, land released to Peck
07-30-28	H.W. West	John H. Trant, Jr.	
07-05-28	R.D. White	John H. Trant, Jr.	
05-28-28	Cradock Mfg. Co.	Richard B. Kellam, Special Commissioner	
08-06-45	Joseph W. Dunkam, et al.	Julius S. Peck (formerly Julius S. Pecker)	1 st - 2.304 ac. 2 nd - 1 ac. 3 rd - 0.55 ac. 4 th - Parcel 1 - 0.004 ac. Parcel 2 - 0.17 ac.
06-29-44	Commonwealth of Va.	Joseph W. Dunkum	4 th - Parcels 1 & 2; quit claimed to Dunkum
05-31-43	County of Norfolk	Commonwealth of Va.	4 th - Parcels 1 & 2; quit claimed to Commonwealth of Va.
08-03-28	Norfolk Portsmouth Bridge Corp.	County of Norfolk	4 th - Parcels 1 & 2
04-18-28	Cradock Mfg. Co.	Joseph W. Dunkum	3 rd - 0.55 ac.
04-16-27	Cradock Mfg. Co.	Joseph W. Dunkum	1 st - 2.304 ac.
04-27-26	Cradock Mfg. Co.	Joseph W. Dunkum	2 nd - 1 ac.

Mr. Randy Sturgeon

May 10, 2006

Page 5

4. *Explain how hazardous substances such as, but not limited to, polychlorinated biphenyls (PCBs) and lead came to be present on the site.*

RESPONSE:

The metal scrap purchased during the period of scrap metal operations consisted of damaged and obsolete equipment, attachments, parts, and other miscellaneous materials. At various times the scrap contained cadmium-coated automobile parts; lead as an additive in petroleum products; PCBs in insulated wire, gaskets, fluorescent lights, transformer oil, and household appliances that used capacitors; lead-based paint in scrapped bridge sections; and lead in automobile batteries. Metal scrap from the government was not cleaned or purged of hazardous substances before transfer to the Peck property.

5. *Provide all information regarding the current or past environmental and physical conditions at the Site including but not limited to geology and hydro-geology, soil, groundwater, surface-water (including drainage patterns), sediments, sewer systems, and storm water conveyance systems. This includes, but is not limited to, field observations and measurements, laboratory data, field screening data, boring logs, sample locations and dates.*

RESPONSE:

Physical and chemical data for the property have been submitted to the Virginia Department of Environmental Quality ("DEQ") and EPA. Peck believes that information provided to DEQ and EPA through December 2004 confirmed that there are discrete locations on the property with elevated concentrations of certain parameters, but that there would be no unacceptable risk to the environment or to humans if the property were covered with a cap and restricted as to future use. Furthermore, there were no indications that the property would endanger anyone if left undisturbed. A risk assessment prepared for Peck indicates that there would be no unacceptable risks to humans or the environment or the likelihood of a release to groundwater even if it were assumed that there are PCB concentrations of up to 5,000 mg/kg in the former metal processing area.

The following table lists reports and other communications by which EPA and/or DEQ were provided information responsive to this question. Peck is not submitting copies of these reports and communications with this response but will provide them to EPA upon request.

HUNTON & WILLIAMS

Mr. Randy Sturgeon
May 10, 2006
Page 6

Date	Recipient	Sender	Description
15-May-03	Bernard, J.	Werner, S.G.	Draft Site Characterization Risk Assessment Report
28-May-03	Bernard, J.	Werner, S.G.	Site Characterization - Risk Assessment Report, Proposed Pull-A-Part Site, 3500 and 3850 Elm Avenue, Portsmouth, Virginia
04-Aug-03	Bernard, J.	Werner, S.G.	Response to DEQ's 18-Jun-03 letter commenting on Site Characterization Report and proposing a sampling program
12-Aug-03			Quantitation Report of samples obtained on 8-Aug-03
11-Sep-03	Greene, K.L.	Peck, B.D.	Letter regarding EPA's desire to sample for dioxin contamination at site; briefly discussing previous site operations; and requesting authorization from DEQ to go forward with site remediation
21-Oct-03	Werner, S.G.	Unze, S.C.	Attaches sample results for PCDDs and PCDFs
04-Nov-03		Williams, M.D.	Pull-A-Part Sampling Event: 08-06-03
07-Nov-03	Bernard, J.	Werner, S.G.	Site Characterization Study Addendum; attached is 27-Oct-03 memorandum to J. Bernard from S.G. Werner presenting sediments sampling plan
21-Nov-03	Werner, S.G.	Kinder, D.S.	Explanation of deficiencies cited in M. Williams 4-Nov-03 report
18-Dec-03	Bernard, J.F.	Hatcher, R.F.	Email forwarding colloquy between J.F. Bernard and S. Hahn of NOAA regarding the Peck Property Report addendum
17-Feb-04	Werner, S.G.	Williams, M.D.	Memorandum regarding QA/AC criteria

Mr. Randy Sturgeon

May 10, 2006

Page 7

Date	Recipient	Sender	Description
17-Feb-04	Bernard, J.	Werner, S.G.	Response to EPA's 15-Jan-04 "Characterization Report Review"; attached are: EPA's 15-Jan-04 letter; QA/QC reports for PCB and lead analyses for soil samples; summary of data validation performed by Draper Aden; and a response by laboratory to deficiencies identified by Draper Aden
30-Mar-04	Rice, S.	Werner, S.G.	Letter enclosing PCB analytical data, including map showing October 2003 PCB soil sampling results
11-May-04	Welsh, D.S.	Werner, S.G.	Letter enclosing Peck's "Self-Implementing PCB Cleanup Plan"
28-Jun-04	Peck, D.B.	Jarvela, S.	Letter stating EPA wants to conduct sampling at Peck site's wetlands and shoreline along border of property and Paradise Creek. Property Access Agreement attached
29-Jun-04			EPA Region III "Property Access Form" granting EPA and members of response team access to The Peck Company Site to collect samples for PCB and metals analysis
07-Jul-04			Sediments chain of custody form prepared by Mr. Hatcher
13-Jul-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 22-Jun-04 letter to B.D. Peck from J.J. Burke regarding deficiencies in Self-Implementing PCB Cleanup Plan; attached is Revised (12-Jul-04) Site Characterization and Self-Implementing PCB Cleanup Plan

HUNTON & WILLIAMS

Mr. Randy Sturgeon
May 10, 2006
Page 8

Date	Recipient	Sender	Description
20-Jul-04		Severn Trent Labs	Sample confirmation report
16-Aug-04	Hatcher, R.F.	Jarvela, S.	Email regarding preliminary results of 7-Jul-04 sampling event
03-Sep-04	Hatcher, R.F.	Rieger, J.	Summary of samples taken; cost of analysis; map of locations where samples were taken
28-Sep-04	Loeb, M.	Werner, S.G.	Email update on sample analysis
26-Oct-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 15-Oct-04 correspondence regarding Self-Implementing PCB Cleanup Plan; attached is Revised (22-Oct-04) Site Characterization and Self-Implementing PCB Cleanup Plan
18-Nov-04	Hatcher, R.F., Werner, S.G.	List, R.	Email setting out treatability study results and suggesting a meeting to discuss the results, treatment/stabilization strategies, regulatory implications and costs.
23-Nov-04	Hatcher, R.F., Werner, S.G.	List, R.	Additional treatability results
06-Jan-05	Hatcher, R.F., Bernard, J.F., Green, K.L.	Rieger, J.	Email regarding 70 ppb PCB screening level in sediments
03-Feb-05	Hatcher, R.F.	Williams, T.G.	Fax proposing use of same grid numbers and letters system as drawing supplied to Koontz-Bryant, reporting of plant to conduct site work from 8-Feb-05 thru 10-Feb-05
09-Feb-05	Bernard, J.	Werner, S.G.	Memorandum regarding soil sample location plan
16-Jun-05	Werner, S.G. & Hatcher, R.F.	Webb, J.N.	Requesting status of grid sampling effort



Mr. Randy Sturgeon
May 10, 2006
Page 9

Date	Recipient	Sender	Description
Undated			Site location map; well locations and boring locations; summary of analytical data - surface soil samples (6/1999 & 7/1999); summary of analytical data - soil/water interface soil samples (7/1999); summary of analytical data - groundwater (7/1999); summary of analytical data - mixed media (7/1999)

Peck is submitting to EPA with this response the laboratory data reports for samples collected at the property during 2005.

6. *Provide all documents that show the types of material accepted, customers, operational periods, and description of operations (including locations of operations) both owned and/or operated by you or any tenant(s).*

RESPONSE:

Peck has no documents in its possession responsive to this question. The following provides a brief description of operations on the property based on David Peck's recollection.

The operations at the property until the 1980's were located in and around the cinderblock buildings in the center of the property. At one of the buildings, a hydraulic guillotine shear cut steel to size. One building served as a sorting and storage room for non-ferrous metals and contained a small aluminum furnace to melt aluminum scrap. In the front, by the stop light, was a men's locker room and machine shop. A weigh scale was outside an office trailer near the stop light.

During the period of scrap metal operations on the property, the Department of Defense processed and sold metal scrap to Peck Iron & Metal from various military bases and Navy yards, including: Norfolk Naval Shipyard; Naval Air Station; Oceana; St. Juliens Creek; Cheatham Annex; Yorktown; Quantico; Ft. Meade; and Bellwood. The General Services Administration, Coast Guard, NOAA, and other agencies of the federal government also regularly sold surplus material to Peck Iron & Metal. Other large, non-government sellers to Peck Iron & Metal included the railroads, Virginia Electric and Power, landfills (which were

Mr. Randy Sturgeon
May 10, 2006
Page 10

sources of white goods and miscellaneous scrap), and the ship repair facilities, including Newport News Shipbuilding and Drydock, Norfolk Shipbuilding, and Moon Engineering.

Two occupants of the property -- neither affiliated with Peck -- in approximately 2001-02 operated businesses involving the handling of equipment and perhaps scrap metals. One occupant's operation led to action by DEQ, after which Peck evicted the occupant from the property. Currently, Able Body Demolition is using the property for truck storage and is helping to keep the property secure.

7. *Provide any correspondence to or from local, state or federal governments that discuss environmental conditions or issues at the property. This could include, but is not limited to, information regarding inspections, permits, violations and discharges.*

RESPONSE:

At the time Peck entered the Virginia Voluntary Remediation Program, its past and current environmental data were provided to DEQ. The history was also carefully reviewed by the Elizabeth River Project before it accepted approximately seven acres for a conservation easement.

The following table lists reports and other communications by which EPA and/or DEQ were provided information responsive to this question. Peck is not submitting copies of these reports and communications with this response but will provide them to EPA upon request.

Date	Recipient	Sender	Description
30-Apr-02	Gussman	Mayfield, M.	Letter informing DEQ of grant to address stormwater and habitat enhancement at Peck site
01-May-02	Peck, B.D.	Jackson, M.M.	Letter recommending demonstration project to enhance shoreline/stormwater on western side of Peck project, indicating that ERP expected \$30,000 to \$40,000 in grant funds to be available to assist in this voluntary project

Mr. Randy Sturgeon
May 10, 2006
Page 11

Date	Recipient	Sender	Description
06-Nov-02	Various	Jackson, L.	Email requesting comments on attached "Project Activities Coordination Meeting for 'Return to Paradise' - Peck Iron & Metal, Timeline of Action Items." List of attendees also attached.
27-Nov-02	West, T.	Pocota, M.A.	Letter regarding Joint Permit Applications (Peck and Elizabeth River Project) for wetlands restoration project and a stormwater/wetland pond
02-Dec-02		U.S. Army Corps of Engineers	Notification that Peck's proposed activity may qualify for Nationwide Permit 39; that proposed activity may affect historical properties (Norfolk Naval Shipyard); therefore, work cannot commence until requirements of National Historic Preservation Act have been met
06-Dec-02	Greene, K.L.	Cohen, A.	VRP Application for property located at 3850 Elm Avenue
13-Dec-02	Levetan, S.L.	Mayfield, M.	Letter offering grant-funded assistance to implement ERP's recommendations for sustainable development of Peck Site. Attached is "Environmental Stewardship Recommendations, Proposed Pull-a-Part Auto Recycling Facility, Elm Avenue, Portsmouth, VA" and "Best Management Practices for the Auto Salvage Industry"

Mr. Randy Sturgeon

May 10, 2006

Page 12

Date	Recipient	Sender	Description
06-Jan-03		VIMS	VIMS Shoreline Permit Application Report 02-2315 recommending applicant submit formal planting and monitoring plan
09-Jan-03			Notice of Public Hearing, Wetlands Board of the City of Portsmouth - Request of The Peck Company and The Elizabeth River Project for a wetland restoration area on the property at 3850 Elm Avenue
06-Mar-03			Portsmouth City Council, Public Hearing/Planning Items. Resolution (signed by City Manager) approving with conditions Pull-A-Part of Portsmouth's proposal to operate a motor vehicle recycling facility at 3850 Elm Avenue
11-Mar-03			Portsmouth City Council, Agenda. Pull-A-Part's use permit application is on agenda
14-Mar-03	Porter, S.J.	Wetmore, D.G.	Letter stating the exception request for BMP should not be granted because it does not meet necessary requirements
02-Apr-03	Pocta, M.A.	Porter, S.J.	Letter requesting additional WQIA information for site be submitted to Department by 11-Apr-03
10-Apr-03	Haste, G.J.	Pocta, M.A.	CBLAD and City of Portsmouth need stormwater calculations and justification for the stormwater location in the RPA buffer

Mr. Randy Sturgeon
May 10, 2006
Page 13

Date	Recipient	Sender	Description
11-Apr-03	Hatcher, R. F.	Hannah, J.	"Benefits of Proposed Stormwater Wetland at Peck Iron & Metal Site," Bill Hunt, Advisor to the Elizabeth River Project
14-Apr-03	Porter, S.J.	Hatcher, R.F.	Letter responding to 2-Apr-03 letter to M.A. Pocta in connection with locating a BMP within the Resource Protection Area for Paradise Creek wetlands
22-Apr-03	Porter, S.J.	Pocta, M.A.	Letter withdrawing Application for Exception from consideration at the City's Planning Commission meeting on 6-May-03
22-Apr-03	Hatcher, R.F.	Porter, S.J.	Memorandum stating information the City was seeking on stormwater calculations and buffer was not submitted timely and therefore will not be considered at the Planning Commission's 6-May-03 meeting
15-May-03	Bernard, J.	Werner, S.G.	DRAFT Site Characterization - Risk Assessment Report
28-May-03	Bernard, J.	Werner, S.G.	Site Characterization - Risk Assessment Report. Attached are: results of 29-Jul-99 Hatcher-Sayre Site Characterization Study; REAMS Risk Analysis; groundwater analytical results for 5-03 sampling; 9-Jul-99 Final Scope of Work for Site Investigation at The Peck Company, Portsmouth, Virginia
18-Jun-03	Hatcher, R. F.	Bernard, J.F.	Comments from DEQ and EPA on 28-May-03 Site Characterization Report and 4-June-03 site visit

Mr. Randy Sturgeon
May 10, 2006
Page 14

Date	Recipient	Sender	Description
18-Jun-03	Hatcher, R.F.	Bernard, J.F.	Letter commenting on 28-May-03 Site Characterization Report and 4-Jun-03 site visit
23-Jun-03	Hatcher, R.F.	Dinardo, Nicholas	Email requesting site visit with representatives of EPA, DEQ, and Peck.
14-Jul-03	Bernard, J.F.	Hatcher, R.F.	Letter regarding 9-Jul-03 meeting with DEQ and EPA, Peck's and Pull-A-Part's commitment to locate, remove and remediate "hot spots"
04-Aug-03	Bernard, J.	Werner, S.G.	Response to DEQ's 18-Jun-03 letter commenting on Site Characterization Report and proposing a sampling program
11-Sep-03	Greene, K.L.	Peck, B.D.	Letter regarding EPA's desire to sample for dioxin contamination at site; briefly discussing previous site operations; and requesting authorization from DEQ to go forward with site remediation
15-Sep-03	Comacho, J.	Werner, S.G.	Email inquiry regarding dioxins in soil -- capping as remediation
15-Sep-03	Cooper, D.	Werner, S.G.	Email listing questions regarding dioxin Werner would like to discuss with Cooper in a 1:30 telephone conversation
22-Sep-03	Rupert, R.	Jackson, M.M.	Memorandum setting out the Elizabeth River Project's position on disputed issues concerning contamination at the Peck site
25-Sep-03	Levetan, S.L.	Bernard, J.F.	Comments from DEQ and EPA on 4-Aug-03 Response to Comments and Proposed Sampling Plan

Mr. Randy Sturgeon

May 10, 2006

Page 15

Date	Recipient	Sender	Description
09-Oct-03			Agenda for 9-Oct-03 Elizabeth River Project meeting
07-Nov-03	Bernard, J.	Werner, S.G.	Site Characterization Study Addendum -- describes sampling activities between Jun- and Nov-03, analytical testing results and proposed approach to site remediation; attached is 27-Oct-03 memorandum to J. Bernard from S.G. Werner presenting sediments sampling plan
18-Dec-03	Bernard, J.F.	Hatcher, R.F.	Email forwarding colloquy between J.F. Bernard and S. Hahn of NOAA regarding the Peck Property Report addendum, stormwater runoff and the buffer
30-Dec-03	Hatcher, R. F.	Levetan, S.L.	Email forwarding language regarding "Peck 20031211 Review Ltr 1" providing EPA comments and observations of the 7-Nov-03 Peck Site Characterization Report
09-Jan-04	Hatcher, R.F.	Mayfield, M	Email entitled, "Elizabeth River Partnership - Jeopardy?" in which Mayfield forwards an exchange with Don Welsh, EPA Regional Administrator
15-Jan-04	Bernard, J.	Jarvela, S.	EPA's comments on Site Characterization Report
23-Jan-04	Bernard, J.F.	Greene, K.L., et al.	Email forwarding comments and observations on the 7-Nov-03 Peck Site Characterization Report

Mr. Randy Sturgeon
May 10, 2006
Page 16

Date	Recipient	Sender	Description
06-Feb-04	Bernard, J.F.	Hatcher, R.F.	Email forwarding Bernard's comments to K. Greene regarding EPA's comments and concerns: QA/QC documentation and the vertical investigation area
06-Feb-04	Peck, B.D.	West, T.L., MRC	Acknowledging receipt of application seeking authorization to create wetlands and clear phragmites
13-Feb-04	Bernard, J.F.	Jarvela, S., et al.	Series of emails whereby State requests contact from EPA for Perspective Purchaser Agreement issue; EPA requests point of contact for Pull-A-Part
17-Feb-04	Bernard, J.	Werner, S.G.	Response to EPA's 15-Jan-04 "Characterization Report Review"; attached are: EPA's 15-Jan-04 letter; QA/QC reports for PCB and lead analyses for soil samples; summary of data validation performed by Draper Aden and a response by laboratory to deficiencies identified by Draper Aden
27-Feb-04	Gills, W.	Werner, S.G.	Brownfield Remediation Loan Application submitted on behalf of The Peck Company
09-Mar-04	Jarvela, S.	Bernard, J.F.	Letter stating EPA is satisfied with Draper Aden site characterization and determined the project can proceed to the remediation stage
11-Mar-04	Bernard, J.	Jarvela, S.	Letter stating EPA's position that DEQ is the lead agency for Peck site project and is committed to support DEQ as the remedial action plan proceeds

Mr. Randy Sturgeon

May 10, 2006

Page 17

Date	Recipient	Sender	Description
12-Mar-04	Hatcher, R. F.	Bernard, J.F	Email colloquy at DEQ regarding Peck's Brownfield's loan application
26-Mar-04	Peck, B.D.	Gills, W.A.	Letter notifying Peck the SWCB approved Brownfield Remediation loan in the amount of \$960,000 contingent upon satisfactory credit analysis by the VRA.
16-Apr-04	Bunker, K.	Bernard, J.F.	Email regarding Bunker's assignment as EPA's project manager of the Peck site
22-Apr-04	Bernard, J.	Bunker, K.	Email requesting DEQ to instruct Peck to submit a self-implementing PCB cleanup plan that complies with 40 CFR 761.61(a)
07-May-04			One page synopsis of Peck Recycling Co.'s history
11-May-04	Welsh, D.S.	Werner, S.G.	Letter enclosing Peck's "Self-Implementing PCB Cleanup Plan"
18-May-04	Hatcher, R.F.	Jarvela, S.	Email stating Jarvela hasn't scheduled trip, but will send access form for owner to sign
15-Jun-04	Werner, S.G.	Bernard, J.F.	Email responding to S. Werner's interpretation of 40 CFR section 761.61 in connection with the Self-Implementing PCB Cleanup Plan. Email also discusses wetlands sampling
16-Jun-04	Baldwin, Bob	Jackson, L.	Email requesting a meeting with Baldwin and/or other City of Portsmouth representatives to discuss the City's concerns or needs in order to move forward with Elm Avenue remediation

Mr. Randy Sturgeon

May 10, 2006

Page 18

Date	Recipient	Sender	Description
22-Jun-04	Peck, B.D.	Burke, J.J.	EPA's comments on Peck's Notification and Certification, dated 11-May-04, provided pursuant to requirements of the Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste Regulation
27-Jun-04	Peck, B.D.	Jarvela, S.	Fax cover sheet attaching access agreement; Jarvela will contact Hatcher to schedule site visit
28-Jun-04	Peck, D.B.	Jarvela, S.	Letter stating EPA wants to conduct sampling at Peck site's wetlands and shoreline along border of property and Paradise Creek. Also attaches Property Access Agreement
29-Jun-04			DRAFT "Sampling and Analysis Plan for the Peck Iron and Metal Site, Portsmouth, Virginia" prepared for EPA by Tetra Tech
29-Jun-04			EPA Region III "Property Access Form" granting EPA and members of response team access to The Peck Company Site to collect samples for PCB and metals analysis
13-Jul-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 22-Jun-04 letter to B.D. Peck from J.J. Burke regarding deficiencies in Self-Implementing PCB Cleanup Plan; attached is Revised (12-Jul-04) Site Characterization and Self-Implementing PCB Cleanup Plan

Mr. Randy Sturgeon
May 10, 2006
Page 19

Date	Recipient	Sender	Description
28-Jul-04	Bunker, K.	Peck, B.D.	Memorandum regarding Peck's former operations at Portsmouth site.
28-Jul-04	Bunker, K.	Werner, S.G.	Email attaching a historical summary of Peck's activities at Elm Avenue which were included in 11-May-04 cover letter to Self-Implementing Cleanup Plan
28-Jul-04	List	Bunker, K., EPA	Email giving status on cleanup plan -- still reviewing amended plan EPA received on 14-Jul-04
16-Aug-04	Hatcher, R. F.	Bernard, J.F.	Email stating Levetan indicates Pull-A-Part is very determined to purchase property
20-Aug-04	Hatcher, R. F.	Bernard, J.F.	Email regarding status of Elm Avenue VRP project
23-Aug-04	Ward, K.	Bernard, J.F.	Email stating Elm Avenue project is moving forward
26-Oct-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 15-Oct-04 communication regarding Self-Implementing PCB Cleanup Plan; attached is Revised (22-Oct-04) Site Characterization and Self-Implementing PCB Cleanup Plan
16-Nov-04	Baldwin, R.A.	Barclay, R.C.	Letter Application for Extension of Use Permit 03-01 by Pull-a-Part of Portsmouth, LLC to operate a motor vehicle recycling facility at 3850 Elm Avenue, owned by The Peck Company, Peck-Portsmouth Recycling Co.
19-Nov-04	Peck, B.D.	Burke, J.J	EPA's response to Peck's Revised Notification and Certification, dated 25-Oct-04

Mr. Randy Sturgeon
May 10, 2006
Page 20

Date	Recipient	Sender	Description
01-Dec-04			Chronology of Primary Activities - Proposed Pull-A-Part, Inc. Site - Elm Avenue, Portsmouth, VA
22-Dec-04	Hatcher, R.F.	EPA, DEQ	Confirming 5-Jan-05 meeting to discuss options available under TSCA and/or CERCLA to move forward on remediation of the Peck site
05-Jan-05			Attendance list of meeting
05-Jan-05			Draper Aden, "The Case for Self-Implementing Site Remediation, Peck Property, Portsmouth, VA," presentation to EPA
20-Jan-05	Peck, B.D.	Webb, J.	Letter proposing that Peck amend its 22-Oct-04 self-implementing cleanup plan to include certain conditions and sampling plans
26-Jan-05	Welsh, D.S.	Werner, S.G.	Letter addressing conditions set out in EPA's 20-Jan-05 letter for self-implementing cleanup plan
01-Feb-05	Peck, B.D.	Webb, J.	Letter approving 22-Oct-04 self-implementing cleanup, subject to conditions set out in EPA's 20-Jan-05 letter
23-Feb-05	Ward, K.	Bernard, J.F.	Email colloquy regarding EPA approval of project; inquiry regarding interest rate for Peck's loan
28-Jun-05	Webb, J.N.	Peck, B.D.	Letter notifying EPA, et al. that Peck is going to stop conducting the PCB cleanup plan
15-Oct-05	Peck, B.D.	Burke, J.J.	EPA's response to Peck's Revised Notification and Certification, dated 13-Jul-04

Mr. Randy Sturgeon

May 10, 2006

Page 21

Date	Recipient	Sender	Description
07-Dec-05	Sturgeon, R., EPA	Peck, B.D.	Memorandum setting out reasons for withdrawing self-implementing cleanup plan, conclusions of risk assessment, and proposed "closure" plan
08-Dec-05	Peck, B.D. & Gant, Rene	Sturgeon, R.	Response to Peck's Dec-05 letter

8. *Provide information regarding modifications made to the property, including, but not limited to, areas of fill, areas where the topography was modified, areas of burial and/or dumping, and areas of construction and/or demolition.*

RESPONSE:

Peck demolished a building at the entrance to the property at 3500 Elm Avenue in response to a demand by the N&P Beltline. In addition, part of the former Proctor & Gamble masonry building near that entrance was demolished within the last ten years.

Inert material was dumped on the site by various contractors during the past ten years. If trash or suspect material was found, contractors were employed to remove the material for disposal at a landfill. Able Body Demolition spread inert concrete, asphalt, and soil on the property during the past few months. Any suspect soil or other material was to be placed in the area of the buildings where scrap metal processing operations once occurred.

Please also see the response to question 3 above.

9. *Provide all information on the current and recent use of the Site including actions such as, but not limited to, the storage of soils, material or equipment, or modification or movement of soils or sediments located on the Site.*

RESPONSE:

Please see the answer to question 8 above. In addition, during 2005, Able Body Demolition excavated certain areas of soil, moved the materials to the former operations area, and subsequently covered the area with inert materials. Able Body personnel were warned of the

Mr. Randy Sturgeon
May 10, 2006
Page 22

nature and potential danger of the excavated soil and were instructed about where on the property the soil should be placed.

- 10. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons that worked at the Site for longer than three years.**

RESPONSE:

Stanley Peck and Aaron Peck worked at the property for a period of time until the early 1990s. Their current addresses and phone numbers are:

Stanley J. Peck

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Aaron M. Peck

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Personnel records from the period of active site operations were not retained.

- 11. If you have any information about other persons/entities who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the person's entity's name, address, type of business, and the reason(s) why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

RESPONSE:

Peck has no additional information responsive to this question.



Mr. Randy Sturgeon
May 10, 2006
Page 23

Please contact Roger Hatcher or me if you have questions about this response to the Information Request.

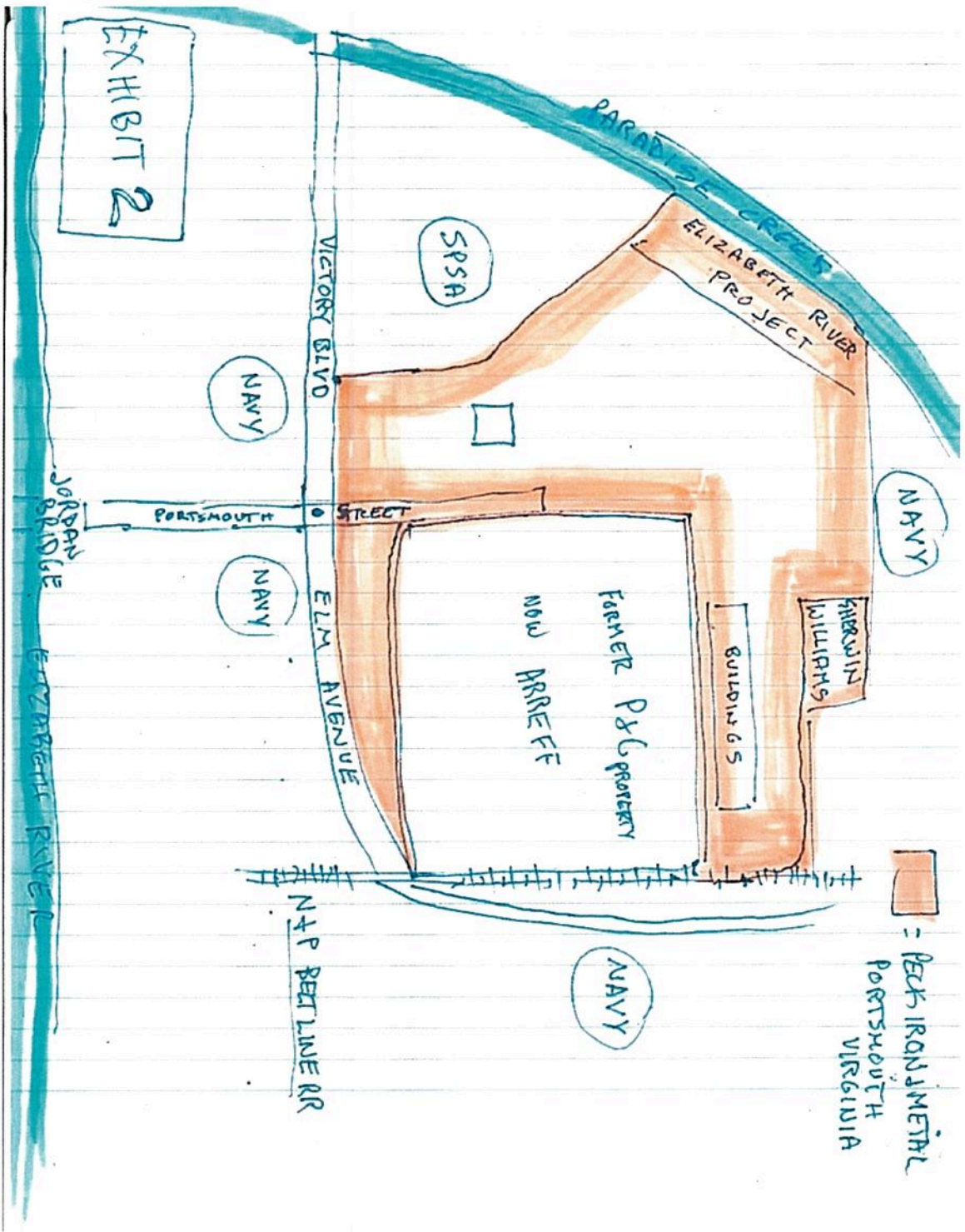
Yours truly,

A handwritten signature in cursive script that reads "Dan J. Jordanger".

Dan J. Jordanger
Counsel to The Peck Company

Enclosures

cc: Mr. B. David Peck
Roger F. Hatcher, Ph.D.





Draper Aden Associates

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E4 3

May 11, 2004

Mr. Donald S. Welsh
Regional Administrator
U.S. EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Self-Implementing PCB Cleanup Plan
34-Acre Site, Elm Avenue
Portsmouth, Virginia
DAA Project # R03186-01

Dear Mr. Welsh:

This Self-Implementing PCB Cleanup Plan is submitted on behalf of The Peck Company, Richmond, Virginia for the above referenced property. This property has been in the Virginia Department of Environmental Quality's Voluntary Remediation Program for more than a year and we are anxious to return this inactive property to productive use. The remaining issue that has stopped progress on this project concerns PCBs and thus, the reason for submitting the attached Plan.

The site meets all of the criteria for the self-implementing procedures and we believe that the Plan addresses all of the requirements of 40 CFR § 761.61. Prior to reviewing the plan, it is important that EPA understand the history of this property, which is summarized below by the owner, The Peck Company.

Peck Recycling Co., Inc. bought, sold, and processed metal scrap for fifty years from different locations. The metal came from industrial plants, farms, auto parts yards, Federal Government (e.g. military bases); State (e.g. Highway Dept.) and Local (e.g. Police Dept.) agencies.

The metal scrap was purchased after several careful inspections. Trained inspectors looked at the material at the sellers' operation, upon arrival, when weighed, when unloaded, when processed, when stored, and when shipped. Upon being unloaded it was visually, if not manually separated into more than 40 different categories.

The material was checked for radioactivity. Rejections were immediate if any hazardous or toxic material or substance were suspected. For example, 150,000 lbs. of material from a military base were rejected when the base could not definitely identify the liquid in the containers; DuPont had to take back 55-gallon drums when Peck was not satisfied with the stenciled markings on the containers; a railroad tank car from Allied Chemical was not accepted when Peck inspectors detected a noxious odor; Philip Morris (e.g. engines with lubricant drippings) material rejected; etc.

Transformers were not accepted from any sellers with the sole exception of a company that processed them. It removed the laminated steel, wires, copper and oil; then it triple rinsed them before delivery.

The Peck Recycling Company's primary concerns were its employees, its customers (the buyers), and its facilities and grounds. Its record is plain to see. None of its hundreds of employees ever reported or complained of handling or being affected by any hazardous or toxic material. Not one of the thousands of consumers ever reported or complained about discovering any substance that might be hazardous or toxic. Every buyer was very carefully looking for PCB, benzene, heavy metals, hydrocarbons, asbestos, and any attachments or substances that might cause problems.

The continuous training of all Peck employees as inspectors and material handlers had clear results. Peck regularly received a rebate of 25% from its insurance carrier for its extraordinary safety record and procedures. Note that every month Peck handled (i.e. received, unloaded, processed, stored, shipped) more than 100 million pounds of metals.

It is also noteworthy that Peck's operations were in five different cities covering more than 120 acres (Eastern Shore, Danville, Woodford, Portsmouth, Richmond). Upon the sale of the Peck operations in 1997, the properties were closely examined. More than \$100,000 was spent in Phase II activities by independent environmental groups. The only PCB discoveries were on less than 1% of the property although 95% of the properties were used in operations. And the 1% area was where material from military bases was processed until 1969.

The property owner, The Peck Company, and the prospective purchaser/developer, Pull-A-Part, Inc. have responded to all of the EPA and DEQ requests and unfortunately, feel that progress has again been delayed. EPA's prompt review and approval of this Plan is greatly appreciated.

Mr. Donald Welsh
U.S EPA - Region III
May 11, 2004
Page 3

Any questions concerning this closure plan should be directed to either Dr. Roger F. Hatcher (804-492-9458) or me (804-261-2937).

Sincerely,
DRAPER ADEN ASSOCIATES

A handwritten signature in black ink, appearing to read "Steve G. Werner".

Stephen G. Werner, P.G.
Director of Environmental Services

Attachment (2)

cc: Dr. Roger F. Hatcher
B. David Peck
James Bernard, DEQ
Steven L. Levetan, Pull-A-Part, Inc.

ANTHONY F. TROY
804.697.1318 telephone
804.698.5162 facsimile
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July 15, 2009

Ms. Karen Melvin
Associate Division Director
Office of Enforcement, Hazardous Site Cleanup Division
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: Notice of Potential Liability, Peck Iron and Metal Site, Portsmouth, Virginia

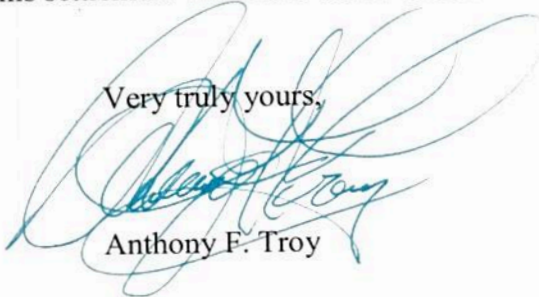
Dear Ms. Melvin:

This firm has been retained to represent Anheuser-Busch in the above-referenced matter. We are in receipt of your letter dated May 20, 2009 regarding the Peck Iron and Metal Site in Portsmouth, Virginia (the "Site"). In the May 20th letter, EPA notified Anheuser-Busch that it is considered a potentially responsible party ("PRP") under CERCLA Section 107(a) for contamination of the Site as a person who arranged for the disposal and/or treatment of hazardous substances sent to the Site.

This letter serves as Anheuser-Busch's response to EPA's May 20th notification. Anheuser-Busch is willing to participate in future negotiations with EPA concerning the Site and encourages EPA to facilitate negotiations with and among the PRPs expeditiously. Pursuant to CERCLA Section 122(e), to the extent such information is available, Anheuser-Busch requests information about the volume and nature of substances contributed by each PRP identified at the facility as well as a ranking by volume of the substances at the facility.

This response is not an acknowledgement or admission of liability. Anheuser-Busch reserves its right to claim any statutory or other defense in this action. Anheuser-Busch further reserves its right to pursue a de minimis settlement with EPA under CERCLA Section 122(g).

Very truly yours,



Anthony F. Troy

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ORIGINAL

July 30, 2008

VIA First Class Mail

Joan Martin Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Ms. Banks:

This responds to the Request for Information Pursuant to Section 104 of CERCLA for the Peck Iron and Metal Site in Portsmouth, Virginia issued May 30, 2008 by Laura B. Janson, Chief, Cost Recovery Branch, United States Environmental Protection Agency, Region III, addressed to the Williamsburg Brewery of Anheuser-Busch Companies, Inc. It was received at Anheuser-Busch Companies, Inc. (together with its subsidiaries the "Company") on June 2, 2008. The Company requested and received a 30 day extension of time in which to respond to this request on June 18.

We understand that the Site has been defined as the Peck Iron and Metal Site located in Portsmouth, Virginia with the listed address of 3850 Elm Avenue. It is also our understanding that the Site has been used for decades for scrap metal recycling, and that operations ceased at the facility in or around 1997.

The Company has made reasonable inquiry and conducted a diligent search of currently available Company records, as well as interviews of all Company personnel that had responsibility for waste management at the time of the transactions with Peck, as well as personnel who currently manage waste, or are responsible for recordkeeping relating to waste management at the Brewery. The responses provided pursuant to the Information Request are not intended and should not be construed as an admission of liability by the Company for the release or threatened release of hazardous substances at the Site, or for any removal or response costs or damages attributable to hazardous substances at that Site.

Answers to Numbered Questions in Information Request

The Company's answers and objections to each of the questions below are set out below following the question from the Information Request.

1. List all shipments of scrap materials, including scrap metal, which your company has sent to the site. Include the date for each transaction, the type and quantity of scrap metal sent, the amount paid or collected in connection with each transaction, the method of payment, and identity of the person making or receiving the payment.

Pursuant to the Company's document retention policy, records relating to the management of recyclable material are only maintained for 3 years. Company records indicate that during that retention period, there were no sales of scrap material to Peck, nor payments received for such material.

In addition, a review of the Company's records relating to universal and hazardous waste generated and shipped off-site by the Company do not reveal any shipments of such waste to the Site. Interviews of Company personnel indicate that Peck Iron and Metal maintained a roll-off container for scrap metal recycling at the Brewery for some period beginning in or around the early 1980's, although they had no information regarding whether material collected in these containers was taken to the Site, or another facility owned by Peck Iron and Metal Co., Peck Recycling, Julius S. Peck, B. David Peck, or Aaron Peck, or any other related company or Peck family member (collectively "Peck"). Records received from EPA indicate that materials were sold to Peck during the period of 1990 through 1995, with additional information that sales may have occurred as early as 1985.

Records received from EPA indicate that the following materials were sold to Peck by the Brewery.

Date	Material	Amount (pounds)
2/19/1990	Scrap Aluminum (also noted as steel)	21,620
9/21/1990	Scrap metal	21,020
10/24/1990	Scrap metal	27,240
11/27/1990	Scrap metal	20,640
12/11/1990	Scrap metal	17,580
12/19/1990	Scrap metal	14,260
12/28/1990	Scrap metal	9,000
1/23/1991	Scrap metal	21,980
1/25/1991	Scrap metal	13,400
1/31/1991	Scrap metal	14,040
2/12/1991	Scrap metal	19,100
3/12/1991	Scrap metal	26,500
4/10/1991	Scrap metal	18,120
4/19/1991	Scrap metal	11,020
5/9/1991	Scrap metal	21,980
6/5/1991	Scrap metal	17,980
6/24/1991	Scrap metal	12,340
7/11/1991	Scrap metal	19,980
7/23/1991	Scrap metal	17,480
7/30/1991	Scrap metal	14,200
8/6/1991	Scrap metal	11,740
8/21/1991	Scrap metal	13,340
6/6/1995	Shredder Steel	9,200
6/28/1995	Shredder Steel	15,140
7/19/1995	Shredder Steel	13,080
7/26/1995	Shredder Steel	10,800
8/15/1995	Shredder Steel	17,060
8/25/1995	Shredder Steel	20,760
8/29/1995	Shredder Steel	22,600
	Total	493,200
		220.2 Gross Tons

2. For each shipment of scrap materials identified in response to Question 1 above, identify:

- a. the source of the scrap material;**
- b. the prior use of the scrap materials;**
- c. whether the scrap material was a collection of homogenous materials;**
- d. whether the scrap materials was tested for any hazardous substances prior to shipment to Peck Iron and Metal Co.**

a. The sources of scrap materials were from the Anheuser-Busch Brewery in Williamsburg located on Pocohontas Trail (the "Brewery").

b. The prior uses included structural steel and piping, as well as some components of brewing and packaging equipment.

c. The materials were relatively homogenous in that the scrap metals consisted of primarily only carbon and stainless steel. The Brewery currently maintains separate roll-offs for stainless steel and other scrap metals, although interviews with Brewery personnel indicate that both types of metals were previously commingled in a single roll-off. This practice appears to be reflected in the invoices provided by EPA.

d. The Brewery has had a long standing practice of identifying and abating asbestos containing materials, such as insulation, lead paint, and calcium silicate insulation prior to any work that would have resulted in the removal of structural steel, piping or other components. This practice has included the identification of such wastes through sampling. Materials identified through this process which would be disturbed by such work were removed and stored in separate areas of the Brewery to ensure that asbestos and lead paint wastes were not commingled with other wastes at the Brewery. However, lead paint abatement typically consisted of removal of lead paint from the areas within a foot of hot work, such as welding, cutting and grinding. Larger sections of piping or steel may have been removed with areas of lead paint intact and placed in the roll-off container for recycling. In addition, oil and other fluids are drained from any equipment prior to it being sold for recycling. These practices have been in place since at least the early 1980's.

3. At the time of the transaction(s) involving scrap materials listed in your response to Question 1(a), what was the intended disposition of the scrap materials at the Site?

The intended disposition of the scrap materials was for use in creating new metal products through recycling.

4. Did a market exist for the scrap metal listed in your response to Question 1, above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g. ISRI, Department of Defense, or wherever your company would find the grade published)

There was a market of the materials as evidenced by payments received by the Company from Peck for such materials; however the Company did not and does not track that market or the trends of that market.

5. What commercial specification grade did the scrap metal listed in your response to Question 1 (a) meet? Identify/ list the commercial specification grades that each scrap metal identified in 1 (a) met.

Piping and structural carbon steel is general grade A36. Additionally, stainless steel equipment and components are typically grades 304, 316 or A9.

6. After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to Question 1 (a) was to be made available for use as a feedstock for the manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated

It was the understanding of the Company that all scrap metal sold for recycling was for use as feedstock for new saleable products.

7. Could the Scrap metal listed in your response to Question 1 (a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

It was and is the Company's understanding that some portion of the scrap metal sold for recycling could have been used as a replacement or substitute for virgin raw materials. However, the Company does not track the details of the scrap metal market with regards to the precise uses for these materials.

8. Could any products to be made from the scrap metal listed in your response to Question 1 (a) have been used as a replacement or substitute for a product made, in whole or in part from a virgin raw material? If so, provide details.

The Company believes that some portion of the products ultimately made from the scrap metals were used as a replacement or substitute for products made, in whole or in part, from virgin materials. However, as stated above, the Company does not track the market for recycled scrap metals, nor the products made from this material.

9. Did your company process any of the scrap materials sent to Peck Iron and Metal Co. prior to transport and delivery to the Site? If yes, describe the process used and the purpose for subjecting the scrap materials to the process.

The Brewery did not process the metals prior to sale to Peck, other than those abatement processes discussed in the response to Question 2, above.

ORIGINAL

10. Was the transaction between your company and Peck Iron and Metal Co. : 1) an outright sale? 2) the subject of a written or verbal "tolling" agreement between the companies; or a 3) the "banking" of the transacted materials in a metal account at the request of your company for return or other disposition at a later date.

Based on the recollections of the former purchasing manager, the Brewery and Peck entered into annual contracts for the outright sale of scrap metals, and did not enter into tolling or banking arrangements with Peck. This arrangement is further evidenced by the limited invoices and settlement statements. To the Company's knowledge, no transacted materials sold to Peck were ever returned to the Company.

11. Did your company have a basis for believing that the scrap materials listed in your response to Question 1(a) would be recycled? If not, what was that basis? Provide supporting documentation.

Interviews with Company personnel indicate that the Company's understanding was that the scrap metal taken by Peck was to be recycled. As Peck paid the Brewery for the materials, this was evidence that the materials had some residual value, and would not simply be sent for disposal.

12. Describe all efforts (i.e. site visits) taken by your company to determine what would be done with the scrap materials identified in your response to Question 1(a) that may have been sold, transferred or delivered to Peck Iron and Metal Co. at the Site.

Interviews with Company personnel and a review of all available records did not disclose the efforts taken by the Company with regards to Question 12.

13. What steps (e.g. internal procedures, Federal, state and local compliance inquiries) were taken by your company to ensure that Peck Iron and Metal Co. the recipient of the scrap materials listed in your response to Question 1 (a), was in compliance with applicable Federal environmental regulations or standards and any amendments, with respect to the scrap materials it received from your company?

The Company does not have any records indicating what efforts may have been conducted relating to ensuring that Peck was in compliance with applicable environmental regulations or standards. However, as stated above, the Company has a long standing policy of conducting a review of dealers used for scrap metal recycling. The current policy requires that a wide range of inquiries into a recycling facility's compliance with law, the nature of the recycling process, end use of the recycled material, and what regulations apply to both the facility and haulers of recyclable material to the facility. Although it is unclear what policy was in place at the time Peck began its dealings with the Brewery, historically the Company has at a minimum made inquiries into whether scrap metal dealers and other recycling vendors have been the subject of federal or state environmental enforcement.

ORIGINAL

14. Did your company have any basis for believing that the Peck Iron and Metal Co. facility at the Site was in compliance with substantive provisions of any Federal, state or local environmental laws or regulations, or compliance order or decree applicable to the handling, processing, reclaiming, storage or other management activities associated with the scrap materials listed in your response to Question 1(a)? If so, identify that basis and provide supporting documentation.

The Company does not have any records relating to the Site's compliance status. As discussed above, however, Company policy would have called for some inquiry into the compliance history of any scrap metal dealer utilized by the Brewery.

15. Describe the efforts your company undertook with respect to the management and handling of the scrap materials listed in your response to Question 1 (a), including the extent to which you complied with customary industrial practices current at the time of the transaction designed to minimize contamination of the scrap materials by hazardous substances.

The Company utilized and continues to utilize periodic visual examination procedures to ensure that materials being sold for recycling do not contain hazardous substances. As noted above, Company procedures ensure that all work which resulted in the production of scrap metal is preceded by an examination of the area for asbestos and lead paint, followed by an abatement action as necessary. Asbestos and lead paint wastes are and were managed in separate areas of the Brewery from those utilized for scrap recycling. However, Company personnel did indicate that in some instances lead paint abatement efforts may be limited to an area roughly one foot around any area where hot work was conducted, such as cutting, welding or grinding.

In addition, waste oil, waste paint and waste ink generated at the Brewery are and were managed in completely separate areas of the Brewery, and policies are and have been in place to ensure that such wastes are not commingled with scrap metals. In addition, the roll-off containers for scrap metal are and were separated from the area used for handling other recycled materials at the Brewery, which include cardboard, plastics, plastic bottles, mixed paper, spent grain, wood pallets, beechwood chips, aluminum and glass cullet.

While a letter dated August 1, 1985 to Dan Kelley at the Brewery indicates that a load was rejected by Peck due to the presence of suspected asbestos and lead storage batteries, the Company did not locate any documentation confirming that the materials in such load did, in fact, contain asbestos insulation. In addition, the Brewery has separated and managed universal wastes such as lead acid batteries for a number of years. No information is available regarding how batteries may have become commingled with scrap metal sold to Peck.

ORIGINAL

16. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management or other activities associated with the scrap materials listed in your response to Question 1(a).

The Company does not possess documentation of storage, transport, management or other activities associated with the scrap materials sold to Peck other than those provided by EPA. This is due to the fact that records relating to the handling of recyclable materials are retained for 3 years under the Company's document retention policy, while accounting records relating to accounts payable or receivable are retained for 6 years. However, interviews of Company personnel indicate that asbestos and lead paint in the Brewery was abated and handled in accordance with applicable environmental and safety regulations and standards prior to any scrap metals being sold to Peck.

17. Identify the person(s) answering these questions and requests for copies of documentation on behalf of your company.

The Company specifically objects to EPA communicating directly with its current employees. Should EPA have interest in further inquiry of current employees, its counsel should communicate with the Company's undersigned counsel.

Without waiving its objections, the Company provides the following list of individuals currently employed with the Company who are known to have or have had some role, or may have had some role, in the management of scrap metals.

Marisa Botta, Environmental Health and Safety Manager for the Brewery beginning in 1999 through the present, was primarily responsible for answering these questions with the assistance of inside and outside counsel. In addition, the Company endeavored to interview all current employees who worked at the plant for the period of 1980 to the present who may have information relating to the requests. The following Company personnel, with their positions at the Brewery noted, were interviewed with regards to these questions and requests:

John DeSelm – Director, Environmental Assurance (St. Louis)
Gordon L. Martin – Environmental Health and Safety Manager
JoAnn Lyell – Office Assistant, Environmental Health and Safety Department
Vernard F. Farris – Storeroom Manager
Kirk Reno – Resident Construction Engineer
Dwayne Mattmuller – Resident Construction Engineer from 1995 to 1999
George F. Riesbeck – Plant Engineer
David O. Hamlin – Engineer
James Suer – Chips Finishing Reliability Manager (formerly Maintenance Supervisor in both Brewing and Packaging)
Hattie C. Evans – Accounting Analyst
Susie Jones – Human Resources Assistant (formerly Accounting Clerk)
Doug Schlechte – Accounts Payable (St. Louis)
Pat Guittar – Accounts Receivable (St. Louis)

ORIGINAL

18. For each Request, identify all persons consulted in the preparation of the answer

See list above

19. For each Request, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Request and provide true and accurate copies of all such documents.

The Company has reviewed hard copy and electronic records maintained both at the Brewery as well as the Company's corporate offices in St. Louis. Searches have been conducted seeking any documentation or associations with Peck. While the Company's accounting system identifies Peck Iron and Metal Co. as a vendor, there are no records of any transactions in the system except for a notation indicating that the last sale occurred in November of 1997. No hard copy files exist with regards to transactions with any of the Peck entities. The information provided in this response is based on recollections by personnel employed at this Brewery at the time of the transactions with Peck, as well as the documents provided by EPA.

20. Describe in detail any agreement/ contract your company has had with Peck Iron and Metal Company. In addition, identify any other company operating at the Site and describe in detail any arrangements your company has had with each such company, if any, including the time period of your company's involvement with such company.

Based on the recollections of the former purchasing manager, the Brewery and Peck entered into annual contracts for the outright sale of scrap metals. The former purchasing manager indicated that these were relatively short one or two page contracts, and primarily only required that Peck maintain a roll-off container at the Brewery, and pay set prices for recyclable material placed therein. The Company is not aware of any other company operating at the Site.

ORIGINAL

21. Provide all business records pertaining to your company and Peck Iron and Metal Co. or any other company operating at the Site, including:

- a. Copies of correspondence to and from these companies, including letters and memoranda (both internal and external);**
- b. Copies of invoices, manifests, bills-of-lading, purchasing orders, tickets, and any other documents pertaining to shipping, receiving and transportation scrap materials; and**
- c. Copies of business records pertaining to sale, transfer, delivery or disposal of any hazardous substances, scrap materials, and /or recyclable materials to the Site.**
- d. If you are unable to provide any or all of these documents, explain why and what you did to find them.**

a-c. No documents were located responsive to Questions 21 a through c despite a diligent search of Company records.

d. To help in locating records, the Brewery was searched including the records maintained by the Environmental Health and Safety Department, as well as the Storeroom and Engineering Department. In addition, a search was conducted for any hard copy records that may have been sent from the Brewery to the Company corporate offices. In addition, the Brewery conducted a search of the records sent to Iron Mountain, which is utilized as an off-site records archive.

Anheuser-Busch corporate accounting personnel conducted a thorough search of the corporate accounting system. As noted above, the only information revealed by such search is that Peck Iron and Metal Co. was a vendor utilized by the Company, and the last sale occurred in November of 1997.

22. If you have reason to believe that someone could provide a more detailed or complete response to any of these questions or requests for copies of documents, or if you have reason to believe that there could be someone who may be able to provide additional documents that would be responsive to these questions and requests for copies of documents, identify such person(s), identify the additional documents that they may have and describe any information related to these questions that they may have.

All current employees for whom there was a reasonable belief of knowledge related to waste disposal and recycling activities at the Brewery during the relevant time frame were interviewed. Based on these interviews, and corporate records regarding prior employees, the following individuals may have additional information regarding these questions:

Gerry Provenchar – Former Storeroom employee. Mr. Provenchar may currently reside in Washington State.

Kathryn Aston – Former Environmental Health and Safety Manager. Ms. Aston may currently reside in Williamsburg, Virginia.

Dan Kelley – Former Purchasing Agent. The Company does not have any information regarding the whereabouts of Mr. Kelley.

23. Provide details, including dates and materials involved, of all on-site spills or releases of hazardous materials of which you have knowledge and that occurred during the processing of scrap materials containing hazardous substances at the Site.

The Company, including all current personnel interviewed with regards to this response, is unaware of any spill or releases of hazardous substances at the Site that may have occurred during the processing of scrap materials, or at other times.

ORIGINAL

24. To the extent not identified in Question 1, identify all transactions or agreements for disposal in which your company gave, sold, or transferred any material or item, scrap materials, waste materials, pollutant, or contaminant, including copper-bearing material, and ash to the Site. In addition:

- a. State the dates on which each such person may have given, sold transferred or delivered such material.**
- b. Describe the materials or items that may have been given, sold, transferred or delivered including the type of material, chemical content, physical state, quantity by volume and weight and other characteristics.**
- c. Describe the nature, including the chemical content, characteristics, physical state (e.g. solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement**
- d. State whether any of the hazardous substances identified in subpart c. above exhibit any of the characteristics of a hazardous waste identified in 40 C.F.R. Section 261, Subpart C.**

To the best of the Company's knowledge, no materials sold to Peck contained hazardous substances with the possible exception of intact lead paint that may have remained on piping, and other scrap metals as listed in Question 1, following abatement efforts. The Company does not have any information on the amount of such materials that may have been included in scrap metal sold to Peck. Such lead paint would have been a solid, intact paint coating on the surface of the scrap metals in question.

25. What other materials, if any, did your company send to the Site? (items/materials not covered in Question 24 above)?

- a. Describe the purpose of each sale, transfer, or delivery of materials to the Site.**

To the best of the Company's knowledge, only scrap metals listed in Question 1 were sold to Peck. All were solid in form.

26. Describe what was done to materials indicated in your response to Questions 24 & 25 above once they were brought to the Site including any further processing of materials.

The Company does not have any information regarding the processes utilized at the Site which may have been employed in the recycling of scrap metals.

ORIGINAL

27. Identify the person(s) who sold, transferred, delivered, and selected the Site as the location at which scrap materials from your company were to be disposed or treated.

- a. Identify all documents mentioning these arrangements for disposal**
- b. Describe all efforts (i.e., site visits) taken by the person(s) identified in your response to Questions 25 above to determine what would be done with the materials that may have been sold, transferred, or delivered after such materials had been sold, transferred or delivered to the Site.**

It is unclear who originally selected Peck for recycling of scrap metal. It is possible that it was Earl Jones who was formerly the Storeroom Manager prior to 1993, but is now deceased. Typically, the Storeroom Manager monitored the roll-off container daily, and called the vendor when it was full. The Storeroom Manager would then complete the Material Disposal Order Form, and provide this form to accounting. Based on the form, accounting would invoice the vendor and process payments.

The Company has no records indicating what efforts may have been taken to determine the ultimate fate of scrap metals sold to the Site.

28. For each sale, transfer, or delivery of materials to the Site, had any hazardous substances been added to the materials described in your response to Questions 24 & 25 above? If so, identify the hazardous substances added and the person responsible for adding such hazardous substance.

- a. Why were these hazardous substances added to the materials?**
- b. Describe the source of or the process that produced the materials described in your response to Questions 24 & 25.**

The Brewery has not and does not make it a practice to mix hazardous materials with scrap metals. In fact, Brewery procedures have been in place to ensure that any hazardous substances are removed from scrap metals prior to recycling, such as the abatement of lead paint, asbestos and calcium silicate insulation, and the draining of any oil from scrap metal and used equipment prior to sending such material for recycling. In addition, the various waste streams, particularly hazardous waste streams, have been and are maintained in separate areas and Brewery procedures ensure that these wastes remain segregated.

ORIGINAL

29. Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g. responsibility for the disposal, treatment, storage recycling or sale of your company's wastes, scrap materials and/or recyclable materials). Hereafter, these individuals are referred to as environmental caretakers. For each environmental caretaker, indicate the dates of the individual's employment or contractual obligation (i.e. the dates indicating the length of the individual's tenure[s], the nature of the individual's duties and responsibilities and a description of the type of environmental information that the individual would know).

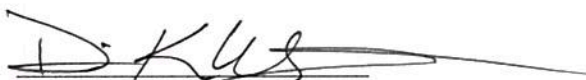
The Environmental Health and Safety Manager is responsible for overall waste management, including scrap recycling at the Brewery.

Kathryn Aston - 1990 to 1999
Marisa Botta - 1999 to present

The Storeroom Manager was previously responsible for the logistics of scrap metal recycling at the Brewery.

Earl Jones - up to 1993
Vernard Farris - 1993 to present

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By Counsel



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United States
Environmental Protection
Agency

PFE ORIGINAL

Region 3

Hazardous Site Cleanup Division

1650 Arch Street

Philadelphia, PA 19103-2029

FAX TRANSMISSION

DATE: 06/08/08

PAGE 1 of 3

PLEASE DELIVER AT ONCE TO:

NAME: Marisa Botta

FIRM NAME: Anheuser - Busch

PHONE: 757-253-2135

FAX NUMBER: 757-253-2154

FROM: Joan Martin Banks

PHONE: 215-814-3156

FAX NUMBER: 1-(215) 814-3005

COMMENTS/NOTE: _____

804405

ADM
DML
H62
CHES
VERC
CATTX
RFAH
RZCO
REYNOL
NNSB
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DATE: 10/31/92 3:58 PM
PROG: 0204

CHECK RECONCILIATION
PECK RICHMOND RECYCLING CO.

PAGE: 1

PFE ORIGINAL

FOR BANK C2 CRESTAR BANK
ACCT 1 RECYCLING ACCOUNT

AS OF 10/31/92

CHK/REF	CHK/REF DATE	SRC	VENDOR/EMP	NAME/DESC	TRAN	CLR DATE	-----CLEARED----- BANK AMT	SYST AMT	OPEN AMT
016630	05/20/91	AP	PR ADVANCE	PAYROLL ADVANCE--002-001-1170	C				15.00
017202	06/13/91	AP	VA STATE	VA STATE POLICE ASSOCIATION	C				40.00
017724	07/10/91	AP	TINDELL	TINDELL CONCRETE COMPANY	C				197.67
017969	07/19/91	AP	BETH-EZ	BETH-EZ SISTERHOOD	C				50.00
018639	08/16/91	AP	NICE JEWIS	NICE JEWISH BOY W/MINI STORAGE	C				2371.50
020835	11/22/91	AP	TECH TIRE	TECH TIRE REPAIR	C				69.79
020970	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				81.70
020971	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				102.00
020972	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				30.00
020973	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				40.42
020974	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				48.25
020975	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				20.00
020978	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				54.52
020979	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				40.00
020980	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				86.55
020981	12/06/91	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				40.00
021087	12/10/91	AP	RICH NEWS	RICHMOND NEWSPAPER, INC.	C				2354.14
021750	01/10/92	AP	RICH NEWS	RICHMOND NEWSPAPER, INC.	C				1418.37
025400	06/26/92	AP	OLD DOMIN	OLD DOMINION CO.	C				370.55
025400	06/30/92	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				60.00
025692	07/10/92	AP	PANNILL	SARA LEE KNIT PRODUCTS	C				800.35
027122	09/10/92	AP	RICHMO CIT	RICHMOND PUBLIC SCHOOLS	C				30.35
027163	09/11/92	AP	CENTRAL MF	CENTRAL MANUFACTURING CO.	C				41962.00
027298	09/18/92	AP	US TREAS	U.S. TREASURY	C				39000.00
027451	09/25/92	AP	GLOBAL EQU	GLOBAL BUSINESS SUPPLIES	C				60.93
027484	09/25/92	AP	MARMON KEY	MARMON/KEystone CORPORATION	C				206.64
027527	09/25/92	AP	SEARS	SEARS COMMERCIAL CREDIT CENTRL	C				287.69
027551	09/25/92	AP	TROP TREHS	TROPICAL TREEHOUSE, INC.	C				621.77
027578	09/25/92	AP	WILL JIMER	WILLIAM JIMERSON	C				50.00
027607	10/01/92	AP	WILL JIMER	WILLIAM JIMERSON	C				40.00
027695	10/08/92	AP	US TREAS	U.S. TREASURY	C				155775.00
027715	10/09/92	AP	ROTONDO	ROTONDO/PENN CAST	C				824.67
027725	10/09/92	AP	AMOCO OIL	AMOCO OIL COMPANY	C				740.02
027728	10/09/92	AP	ANHEUSER B	ANHEUSER BUSCH COMPANY	C				14509.56
027734	10/09/92	AP	BROWNING	BROWNING FERRIS INDUSTRIES	C				87.70
027745	10/09/92	AP	C&P TEL VA	C & P TEL. CO. OF VA	C				41.80
027749	10/09/92	AP	GRAPHA	GRAPHA MANUFACTURING	C				848.18
027777	10/09/92	AP	RICH CITY	CITY OF RICHMOND	C				1455.58
027778	10/09/92	AP	RICHMON CI	CITY OF RICHMOND	C				24.26
027779	10/09/92	AP	RICHMON C	CITY OF RICHMOND	C				13.03
027809	10/09/92	AP	US TREAS	U.S. TREASURY	C				1800.00
027827	10/14/92	AP	ROSS LABS	ROSS LABS	C				5226.47
027888	10/19/92	AP	DURHAM TRA	DURHAM TRANSPORT SERVICES, INC	C				499.11
027901	10/21/92	AP	TRAN SERV	TRAN SERVICES	C				290.00
027914	10/22/92	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				81.70
027915	10/22/92	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				77.05
027916	10/22/92	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				30.00
027916	10/22/92	AP	AR EMPLOYE	A/R EMPLOYEES--002-001-1160	C				40.42